

A P P E A R A N C E S: (Continued)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

BY: JESSICA DAVIDSON, ESQUIRE

One Manhattan West, Suites 42-128

New York, New York 10001

Counsel for Defendants Zhejiang Huahai Pharmaceutical Co.,
Ltd., Huahai U.S., Inc., Princeton Pharmaceutical, Inc., and
Solco Healthcare U.S., LLC (collectively ZHP)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

BY: NINA R. ROSE, ESQUIRE

1440 New York Avenue, N.W.

Washington, D.C. 20005

Counsel for Defendants Zhejiang Huahai Pharmaceutical Co.,
Ltd., Huahai U.S., Inc., Princeton Pharmaceutical, Inc., and
Solco Healthcare U.S., LLC (collectively ZHP)

KIRKLAND & ELLIS LLP

BY: DEVORA W. ALLON, P.C.

ALEXIA R. BRANCATO, ESQUIRE

601 Lexington Avenue

New York, New York 10022

Counsel for Defendants Torrent Pharma, Inc. and
Torrent Pharmaceuticals Ltd. (collectively Torrent)

PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI LLP

BY: JASON M. REEFER, ESQUIRE

One Oxford Centre, 38th Floor

Pittsburgh, Pennsylvania 15219

Counsel for Defendant Mylan Pharmaceuticals, Inc.

GREENBERG TRAURIG LLP

BY: STEVEN M. HARKINS, ESQUIRE

3333 Piedmont Road, NE, Suite 2500

Atlanta, Georgia 30305

Counsel For Defendants Teva Pharmaceutical Industries Ltd.,
Teva Pharmaceuticals USA, Inc., Actavis LLC, Actavis Pharma,
Inc. (collectively Teva)

BARNES & THORNBURG, LLP

BY: KARA KAPKE, ESQUIRE

11 South Meridian Street

Indianapolis, IN 46204

Counsel for Retailer Defendants and CVS Pharmacy, Inc., and
Walmart, Walgreens

A P P E A R A N C E S: (Continued)

ULMER & BERNE LLP
BY: JEFFREY D. GEOPPINGER, ESQUIRE
600 Vine Street, Suite 2800
Cincinnati, Ohio 45202
Counsel for Wholesaler Defendants and AmerisourceBergen

FALKENBERG IVES LLP
BY: KIRSTIN B. IVES, ESQUIRE
230 W Monroe Street, Suite 2220
Chicago, Illinois 60606
Counsel for Defendant Humana

NORTON ROSE FULBRIGHT US LLP
BY: D'LESLI DAVIS, ESQUIRE
2200 Ross Avenue
Suite 3600
Dallas, Texas 75201
Counsel for Defendant McKesson Corp.

Also present:

Larry MacStravic, The Courtroom Deputy

Loretta Smith, Esquire, Judicial Law Clerk to the Honorable
Robert B. Kugler (Ret.)

1 (PROCEEDINGS held via remote TEAMS videoconferencing
2 before the Honorable Thomas I. Vanaskie (Ret.), Special Master,
3 at 10:00 a.m. as follows:)

4 THE COURT: Good morning.

5 THE COURT REPORTER: Good morning, Your Honor.

6 THE COURT: Jessica, good morning.

7 MS. DAVIDSON: Good morning, Your Honor. Can you
8 hear me now?

9 THE COURT: Good morning. Loud and clear. Thanks.
10 Who do we have on for plaintiffs?

11 MR. SLATER: Hello, Judge. Adam Slater.

12 THE COURT: Good morning, Adam.

13 All right. I guess we'll go on the record. Now is
14 the time we set for oral argument on plaintiffs' request to
15 preclude Jinsheng Lin and Maggie Kong from testifying at trial.

16 The parties have briefed the issues extensively, and
17 I'm ready to proceed. And we'll hear from Mr. Slater first.

18 MR. SLATER: Thank you very much, Your Honor.

19 I want to start off just to highlight a couple of
20 important foundational principles, one of which is that from
21 our perspective, ZHP failed to disclose information regarding
22 and of Jinsheng Lin and Maggie Kong in a timely fashion. And
23 based on the case law we cited, the burden would be on ZHP to
24 show that their nondisclosure was substantially justified or is
25 harmless. And I don't think they can meet that burden on this

1 record.

2 I'll also say in also a general sense, ZHP cited a
3 lot of cases, but none of them really apply here, and all are
4 fully distinguishable, because in our case we have a finding of
5 bad faith in terms of the forthrightness of the discovery
6 productions.

7 And I think ultimately we end up where Judge Bumb was
8 when she commented on this; that if the defendant lulled the
9 plaintiffs or misled the plaintiffs, they can't profit or gain
10 from that. And I think that's really what's happening here. I
11 think having those principles in mind, I'll start with Maggie
12 Kong.

13 THE COURT: Well, let me interrupt you for a minute,
14 because hindsight, of course, is 20/20. And this dispute arose
15 when the case was scheduled to go to trial in March, but of
16 course didn't go to trial in March. Why didn't you take action
17 when it was in that period, that suspense period, awaiting the
18 scheduling of a trial, assignment of a new judge, to take the
19 depositions of Jinsheng Lin and Maggie Kong?

20 MR. SLATER: I think that we did take action. I
21 don't think that taking their depositions -- I think that ZHP
22 would have liked us to do that because then they could claim
23 unavailability and try to use the depositions at trial. And
24 that was a concern. But we did take action.

25 When we found out about this, I believe it was on

1 February 22nd, less than a month before the trial when they
2 disclosed these witnesses that were actually intended to come
3 to trial, and we immediately, when the time came to file the
4 trial briefs, objected to them testifying because we felt that
5 it shouldn't be on us now to take their deposition and cure all
6 the prejudice and to create a pathway to get these witnesses
7 into court when they had been named as actual trial witnesses
8 so late in the process. And with the history that came before
9 that, I don't think that ultimately this can be cured by just
10 having the plaintiffs take their deposition and move along.

11 And I think when I walk through each of the two
12 witnesses, I think it can be made much more clear why it is
13 that a deposition or cross-examination at trial is really not
14 sufficient.

15 When you start with Maggie Kong, this is a witness --
16 and I think it's important to look at what the briefs from ZHP
17 say. This is a witness who Your Honor faced these briefs, when
18 the defense didn't even want to turn over a custodial
19 production for her and gave a list of things and said she had
20 absolutely no personal involvement or knowledge with anything
21 relevant to the case. She's merely the chief of staff. They
22 don't even keep a calendar. She doesn't know anything. And
23 they said she doesn't know anything about the development,
24 manufacturing, testing, or sale of the product, which is
25 everything, and overall also said she had no regulatory

1 responsibilities, and that her custodial file will duplicate
2 what Baohua Chen would have known. That's obviously a big
3 concern of ours. We don't want her to be able to come in and
4 be a proxy for Baohua Chen.

5 But look at their brief now, Judge. When they listed
6 the areas that she was not knowledgeable about in their briefs
7 now, they only list the development, manufacturing, testing and
8 sale. They leave out what they told Your Honor three years
9 ago, which is that she had no regulatory responsibilities. And
10 then when you go through the proffer, it's all under the
11 heading of, I would say, regulatory, because it's all related
12 to the recall, which was a regulatory action, and also
13 specifically goes to testing and speaking to customers, which I
14 think would also go within sales because that's why you're
15 contacting customers. And I'm not really sure what the
16 relevance of that is. I don't know that she's going to say
17 that she spoke to Teva or Torrent. So I don't really
18 understand where she's going.

19 But coming back to your question before, why would we
20 take her deposition when they told us she knew nothing and had
21 no personal knowledge of anything that was relevant? And we,
22 again, didn't want to give her a platform to become a
23 mouthpiece for Baohua Chen. So now, all of a sudden, after she
24 had no regulatory responsibilities, now she wants to talk about
25 organizing all the manpower to test and the procurement of the

1 testing materials, all being handled under the disclosure of
2 this regulatory problem with these impurities. Collecting
3 information to give to regulators. I'm reading the list of
4 what they proffered in their brief of what she's going to talk
5 about. ZHP's reaction to the recall. That's regulatory also.

6 The effort -- the effect of the recall on the
7 company, there was an import ban. We know that. That's
8 regulatory.

9 Steps taken to ensure the safety of valsartan. She
10 has no knowledge of development, manufacturing, testing, sale
11 or regulatory issues. I don't understand how she can now, all
12 of a sudden, be able to talk about those things. So I think
13 this is the ultimate gamesmanship. It's the ultimate of they
14 figured out let's just have a witness who we can present as a
15 blank slate and then we can just have her talk about all the
16 things that we said three years ago she didn't know about.

17 And I'd like Your Honor also to take note of, all of
18 a sudden, she has a title that we can't find in any
19 organizational chart which we never saw before.

20 THE COURT: Okay.

21 MR. SLATER: She was always the chief of staff. Now
22 she's the vice president of globalization and development,
23 whatever that means.

24 We looked. We couldn't find an organizational chart
25 that actually gave her that title. If we're missing it, I'm

1 sure that counsel will tell us, but we haven't seen it. In all
2 their briefs, they said all she is, is the chief of staff.

3 So when you look at all of that and her lack of
4 knowledge, and you look at the fact that her custodial file not
5 only is it scarce overall, but she has no documents from
6 May 24, 2018 to June 15, 2018, which is obviously a critical
7 period. But she wants to talk about the communications with
8 pharmaceutical clients. She doesn't have documents for the
9 most important client, Novartis, that time period. And she
10 wasn't involved in that at all. You know, Judge, she wasn't
11 even on the recall team. Baohua Chen was on it. Jucai Ge was
12 on it, who's coming to testify.

13 So when you put all of this together, there's
14 absolutely no reason why she should ever be proffered to
15 testify, unless there's something going on here to try to get
16 around either the Baohua Chen ruling or to try to get around
17 the testimony of other witnesses.

18 There's literally no prejudice to the defense of not
19 letting her testify in light of where we stand. And so that
20 lays out, I think, our argument of Maggie Kong.

21 THE COURT: Let's hear from Jessica on Maggie Kong.

22 MS. DAVIDSON: So, Your Honor, I want to point out
23 that Mr. Slater used the word "gamesmanship." And I wasn't
24 going to use that word because I try hard not to be *ad hominem*
25 about opposing counsel, but this is the ultimate in

1 gamesmanship here.

2 Basically what Mr. Slater is saying to you is he
3 doesn't want Maggie Kong to testify. We have produced 57,000
4 documents from Maggie Kong post -- in the period after the
5 recall having to do with the words either "recall" or
6 "valsartan." 57,000 unique documents beginning 6/1/18.

7 ZHP lost the argument not to do a collection. So
8 Mr. Slater wants it both ways. He got the documents. He got
9 57,000 unique documents. ZHP has the right to choose who to
10 bring to trial. Mr. Slater doesn't want Maggie Kong at trial
11 because, for whatever reason, he thinks it won't be good for
12 his case. That's not how one decides who testifies at trial.

13 And, you know, I hesitate -- just like I hesitate to
14 use the word "gamesmanship," I also hesitate to use the word
15 "due process," because I do feel like due process is something
16 litigants bandy about too often. This is literally a violation
17 of due process to say to a company you cannot bring to trial
18 the witnesses you chose from your employees.

19 And if Mr. Slater thinks that Maggie Kong has nothing
20 to say, he has a right to cross-examine her. That's due
21 process, too. We have a due process right to bring her to
22 trial. He has a due process right to cross-examine her.

23 And I also want to point out that Mr. Slater
24 basically said anything that happened after 2018 has to do with
25 regulatory. I am going to define the word "regulatory" so

1 broad that anything she could possibly say is somehow
2 tangentially related to regulatory and she shouldn't be allowed
3 to do that. But this is his definition. That's the
4 gamesmanship here, not ours.

5 Finally, Your Honor, I want to make a really
6 important point, which is we basically just heard from
7 Mr. Slater a sanctions argument, but the sanctions order was
8 entered.

9 That was, right, SMO 100, entered by the Court. And
10 I think it's really important to look at the words of that
11 permissive adverse inference, because it says "you are
12 permitted, but not required, to infer that the evidence would
13 have been unfavorable to ZHP." And then it says, "any
14 inference you decide to draw should be based on all of the
15 facts and circumstances of this case."

16 Nowhere does it say that ZHP should be barred from
17 bringing to trial the witnesses it has chosen. It says, "The
18 jury will be told that it can draw an adverse inference."

19 That is very different from an evidence-barring
20 sanction. And what Mr. Slater is basically doing today is
21 asking Your Honor to reconsider the sanctions ruling and now
22 enter an evidence-barring sanction. So that has very high
23 standards, as Your Honor knows. In fact, Your Honor stayed
24 away from that for that very reason. There is no evidence to
25 support that here.

1 And if Mr. Slater thinks that Maggie Kong doesn't
2 know things, he is, as we have seen, a very effective
3 questioner, and he can question her about that at trial. But
4 there is no legal, legitimate basis, other than Mr. Slater
5 wanting to choose who testifies, to bar her from coming.

6 THE COURT: Let me ask just a couple of questions,
7 Jessica.

8 MS. DAVIDSON: Okay.

9 THE COURT: On the background of Maggie Kong, from my
10 perspective, having sat through a number of arguments on
11 discovery-related matters, is that Maggie Kong did not possess
12 any relevant information. She was Baohua Chen's chief of
13 staff, described to me more in the nature of an administrative
14 assistant than anybody who had a substantive role.

15 So I was a bit surprised when I saw in your papers
16 that she played some role and she had this title that wasn't
17 chief of staff to Baohua Chen. It had some substantive
18 connotation to it.

19 So when did she assume this role as vice president of
20 globalization and development? I'd like to understand where
21 that fits in here.

22 MS. DAVIDSON: So that really does not fit in here.
23 She just got a promotion a month or two ago.

24 THE COURT: Okay.

25 MS. DAVIDSON: She is now --

1 THE COURT: So that's irrelevant to this.

2 MS. DAVIDSON: Yes. That's irrelevant to this. She
3 received a promotion a month or two ago. I know that she's
4 working on some projects that have to do with Europe. I don't
5 know the details. Since they don't relate to the litigation, I
6 didn't ask.

7 THE COURT: Sure.

8 MS. DAVIDSON: I just know that from the time change
9 of when I need to talk to her that her new role has something
10 to do with Europe, but it is unrelated to this case.

11 And, Your Honor, look, obviously, as you know,
12 there's only so much I can tell you about the past because the
13 events you're describing obviously occurred before Skadden took
14 on representation of ZHP.

15 THE COURT: Sure.

16 MS. DAVIDSON: So I can't -- I don't know exactly
17 what the attorneys at Duane Morris told you or didn't tell you.
18 This is what I can tell you.

19 The chief of staff position is very similar, in my
20 mind. You know, I used to work in politics as a chief of staff
21 on Capitol Hill. That person does have substantive roles. I
22 would not describe Ms. Kong in any way as administrative or
23 secretarial.

24 And obviously what happened when the valsartan was
25 discovered to have these impurities was a major upheaval at the

1 company. She was very involved in the day-to-day after this
2 was discovered, during the recall, after the recall, during the
3 time period when there was an import ban, she was very involved
4 in that part.

5 She is not going to come to trial and testify about
6 the development of the product. She's not going to come to
7 trial and testify about any of those five things that Adam
8 talked about: the sales, the development, the testing, none of
9 that.

10 She was not involved in the DMF. She was not
11 involved in any of that. It is a very narrow discussion of
12 what the company did after this unfortunate series of events
13 occurred and how the company handled that. That is what she
14 would be talking about.

15 THE COURT: Now, Adam, Jessica says that they've
16 produced 57,000 documents from Maggie Kong's file. There's
17 nothing in your mind or in your judgment of relevance in those
18 57,000 documents?

19 MR. SLATER: I'm told the number is 2,497. So I
20 don't know where 50,000 comes from, or 57,000 or whatever
21 number comes from.

22 That number is not the number that we have. It's
23 never been the number we have.

24 There was a lot of documents that they held back for
25 privilege. I don't know if she's mixing up the numbers.

1 Because remember they said she interacts with lawyers or
2 something.

3 THE COURT: Yeah.

4 MR. SLATER: I guess the lawyers' things go through
5 her email to Baohua Chen or something. I don't know. But said
6 they were going to have to hold back some massive number of
7 documents for privilege. But I don't know where 57,000 comes
8 from. They produced 2,497. And --

9 THE COURT: And that's still a large number. Nothing
10 of relevance in that 2,500-document universe?

11 MR. SLATER: Not -- not really. And it's actually,
12 for a litigation of this size, Your Honor, as you know, that's
13 not actually a large number at all. There were duplications,
14 et cetera.

15 But let me unpack a little bit of what you heard
16 there, because I don't think the raw numbers really tell the
17 story that needs to be told anyway. I think the numbers don't
18 help them, because nowhere in those documents is anything
19 between May 24, 2018 and June 15, 2018. If something is not
20 rotten in Denmark with that, I don't know what would be.
21 That's a very, very important time period, and she had no
22 documents during that time period.

23 I want to talk about something that counsel just
24 said. Number one, I've heard this a couple other times where
25 Skadden, Arps' lawyers say, well, you know, that wasn't us,

1 that was Duane Morris.

2 There's no reset. This is the conduct on behalf of
3 ZHP throughout the litigation. So whatever Duane Morris did,
4 they did. And if the ZHP lawyers, the current ones, can't talk
5 to it, then that's a gap that they can't fill, but they don't
6 get a break for that. This is the party --

7 THE COURT: Yeah. And they're not getting a break
8 for that, so that does not resonate with me.

9 MR. SLATER: Okay. I just wanted to say, because I
10 wasn't sure where that was going. But I thought it was also
11 interesting, and I think we are hearing more of what they want
12 to do with this witness.

13 Counsel just said it's going to be very narrow, it's
14 going to be about what the company did after the recall.

15 She's not a 30(b)(6) witness who can testify -- first
16 of all, a 30(b)(6) witness can't even testify affirmatively on
17 behalf of the company to what the company did. She was never
18 designated. She's a fact witness who had no knowledge of any
19 of the relevant areas of this case. And anything she would
20 have to say at trial would have to be based on her personal
21 knowledge and what she did, not Baohua Chen did this, not Min
22 Li did that, not Joe Smith did this, not Jane Smith did that.
23 It would have to be: This is what I did, this is what I knew.

24 And counsel is trying to say that the areas they said
25 she had no involvement with are not within the scope of what

1 they're proffering, but of course it is.

2 And what I was pointing out for you, Judge, before
3 was, when they tried to block the custodial file from being
4 produced, they said she had no regulatory responsibilities. In
5 the briefs they just filed, they left that off the list. And
6 then they list all these other things. They said she had no
7 involvement in testing either. Right here we have:
8 "Procurement of testing materials; organize manpower to test."
9 If she had no involvement with testing, she had no involvement
10 with testing. Those representations were made to the Court in
11 2021 after all these events occurred, which they said she had
12 no involvement with.

13 So if you go through it, everything related to the
14 recall is regulatory. That was a regulatory act and everything
15 they did was being done with FDA oversight. They were making
16 reports to the FDA. It was all being overseen. And they have
17 Linda Lin, the head of regulatory, a 30(b)(6) witness, who has
18 been deposed, and other witnesses who have been deposed on the
19 recall -- the people they actually designated who we were
20 actually able to depose on these things. When we were told
21 these are the necessary custodians, these are the necessary
22 witnesses, we focused on what was needed.

23 If we had asked for the deposition of Maggie Kong
24 after the representations they made, Judge, I would have been
25 laughed out of court. I'm saying that, obviously you wouldn't

1 have literally laughed at me, but you would have said why do
2 you need to take her deposition? You're already taking all
3 these depositions and the defense is saying she doesn't know
4 anything. She's not going to suddenly know something later, so
5 don't -- you're not -- why would you take her deposition?

6 Now, all of a sudden, they want to say she knows
7 something later. I still don't understand what it is they
8 think she's going to talk about. So I think it's, "I want to
9 talk about our company and what the company did." She can't do
10 that. You can't affirmatively do that even with a designated
11 30(b)(6) witness. She certainly can't do it as a person with
12 personal knowledge of very little.

13 And whatever she did was in the role of an
14 administrative assistant. She was the chief of staff. They
15 want to say she's not, but that's literally what they
16 represented. She can't say when things happened because she
17 didn't keep a calendar. They represented that, too.

18 So obviously she's being proffered here to say things
19 that Baohua Chen may have wanted to say or to try to soften the
20 blow for him not testifying in his deposition and whatever else
21 she wants to say. But it all comes within the scope of what
22 they said she didn't know.

23 Were we lulled to sleep? Absolutely, everybody was.
24 And we never pursued her. And then we find out a few weeks
25 before the trial they want to call her, so we did the right

1 thing. We said she shouldn't be allowed to testify. We
2 shouldn't have to go and take a deposition to make her
3 testimony actually admissible if she can't get out of the
4 country or something.

5 So I think that those are the main points with Maggie
6 Kong.

7 THE COURT: Okay. All right. Let's hear from
8 Jessica.

9 MS. DAVIDSON: Briefly. Thank you. Thank you, Your
10 Honor.

11 So, first of all, I think it's very telling what
12 Mr. Slater just said. And I tried to write it down, even
13 though he talks fast, which was, "I don't understand what she's
14 going to talk about." That's the purpose of the deposition.
15 We disclosed Maggie Kong as a trial witness to Adam
16 eight months ago. My email immediately said she's available
17 for a deposition, she's coming to trial, she's available at any
18 point. Let us know when you want to depose her.

19 He made the strategic decision not to depose her,
20 hoping that the Court would just basically give him a break and
21 enable him to benefit from not taking a deposition.

22 So when Mr. Slater sits here and says I don't know
23 what she's going to talk about, that is a choice he made. He
24 made the choice not to know what she's going to talk about by
25 not deposing her.

1 Also, Your Honor, I hope you understood that I am not
2 saying that what Duane Morris told the Court before Skadden
3 came on is somehow no longer relevant. I'm just saying that I
4 didn't feel comfortable commenting on prior representations
5 they made because I wasn't there and didn't make them.

6 THE COURT: All right.

7 MS. DAVIDSON: Next, Your Honor, the Rules of
8 Evidence obviously will apply to all ZHP witnesses just like
9 they'll apply to plaintiffs' witnesses. So if Mr. Slater is
10 concerned that Ms. Kong is somehow going to try to testify
11 outside the scope of her knowledge, which he doesn't know
12 because he chose not to depose her, the Rules of Evidence would
13 apply. There are objections.

14 Judge Bumb made it very clear that she runs a very
15 tight ship in Court. Judge Bumb is not going to allow a
16 witness to testify to something that's hearsay. I think we all
17 know that. She made that very, very clear. So to the extent
18 Mr. Slater's concerned about Ms. Kong testifying outside the
19 scope of her knowledge, the federal rules are there.

20 To the extent he's concerned there's documents
21 missing from her file that he believes are missing, which
22 obviously we have certified to you nothing is missing, and that
23 is Skadden. Mr. Bernardo, my colleague, who's got a lot of
24 integrity, did a full analysis and provided that certification.
25 Mr. Slater can cross-examine her. Between the Rules of

1 Evidence and the ability to cross-examine and the ability to
2 take a deposition, which is still available to him, you know,
3 trial is not tomorrow, that he's chosen to forego, every single
4 one of his concerns has been addressed.

5 I do want to say as to the number of documents, I
6 asked a paralegal this morning to check. I will go back and
7 confirm if I misspoke and I will let the Court now.

8 THE COURT: All right. Thank you.

9 All right. Why not take her deposition, Adam?

10 MR. SLATER: Well, I don't want to bail them out
11 because if I were to start with I'll take their deposition,
12 then there's obviously -- then it's going to be well, then,
13 that's what you want and you can take her deposition and you
14 can fix everything because, you know, everything can be cured
15 with cross-examination.

16 If Your Honor rules that she can testify and she
17 actually makes it to the United States and she's actually here,
18 then I would want to -- then I would ask to take her deposition
19 for a few hours like within a week of her testimony or
20 something like that. But I don't want that to become the
21 linchpin to say, well, there's no prejudice because you're
22 going to depose her. I can't depose her on the gaps in her
23 file. I don't have the documents that had to have existed
24 between May 24, 2018 and June 15, 2018, for example. I don't
25 know what -- when I said I don't know what she's going to say,

1 what I was saying, is I don't understand what she can say
2 because the areas that they represented she doesn't have any
3 knowledge or involvement in is everything. I mean, that's what
4 I was saying is "I don't know what she's going to say."
5 Because, again, if I had asked for a deposition, the defense
6 would have been laughing at us and saying why do they want to
7 depose this person who knows nothing. Maybe we should have
8 asked for it at the time so they could oppose it, but --

9 THE COURT: Yeah; I'm not faulting you for not taking
10 the deposition. And I agree with you, based upon my
11 recollection of representations that were made back a while
12 ago, that Maggie Kong was represented as a person with no
13 relevant knowledge, no firsthand knowledge or simply a conduit.
14 You know, she passed information to Baohua Chen and so maybe
15 sometimes passed information Baohua Chen gave her, but it was
16 more she was simply a conduit. And so, you know, I'm not
17 faulting you for not taking the deposition.

18 I guess what I'm questioning you on is after they
19 designated her as a trial witness, why would you not take her
20 deposition then? Knowing now, hindsight 20/20, that we had a
21 number of months where there was no activity, little activity,
22 in the matter that you could have availed yourself of that
23 opportunity.

24 MR. SLATER: The answer is, we moved in the trial
25 brief to block her testimony, and that motion has been pending

1 until today.

2 THE COURT: Okay.

3 MR. SLATER: So I certainly wasn't going to take her
4 deposition in the interim. I feel like it's unfair to us to be
5 put in that situation, for all the reasons that we've
6 explained, which are not just semantics.

7 I mean, if she -- if she were to be allowed to
8 testify, as a matter of equity in the courts -- and, Your
9 Honor, the idea that you, the Court, doesn't have the right to
10 either preclude or limit testimony from a witness and that
11 somehow this becomes a due process issue is obviously not
12 correct. Witnesses get precluded all the time. They get
13 limited all the time.

14 She certainly would not be -- I don't think it would
15 be completely unfair to allow her to testify -- let me start
16 over.

17 It would be completely unfair to let her testify in
18 any of the areas where they represented she has no personal
19 knowledge or involvement. That would be -- it would be
20 completely unfair to let her now suddenly flip -- forget
21 estoppel. It's not an estoppel -- it doesn't have to be a
22 judicial estoppel issue. It's just a question of what the
23 Court's going to allow somebody to do in terms of they make
24 representations to the Court, they say that this is what the
25 person knows, the person shouldn't be allowed to go beyond

1 that.

2 And, you know, I hope we don't have to have that
3 discussion, but if we have to do that, I think it should be
4 narrowed. And we should only have to depose her if she makes
5 it to the U.S., because, again, I don't want to be baited into
6 taking the deposition of a witness by Zoom and then they say,
7 well, now the witness can't get here so we'll just use the
8 deposition, and then they question the witness in the back half
9 and do their entire direct. That we're not going to do for
10 them.

11 So to the extent the witness is allowed to testify,
12 we would ask to be able to depose, if the witness actually gets
13 to the United States and is actually going to testify, so this
14 can't become a substitute for live testimony. I think that's
15 fair and I don't think it's unreasonable.

16 But I still think that there's no prejudice to them
17 not being able to call Maggie Kong because they said it, she
18 doesn't know anything, she didn't do anything relevant.

19 And, again, we're hearing that she was involved after
20 the recall. I don't understand. She was procuring things?
21 Was she sending letters out? Was she running anything? They
22 said she never had the lead role in any testing. But now
23 they're saying she's going to testify about the testing? It
24 doesn't make any sense, Judge. It doesn't pass the smell test.
25 There's something else going on here.

1 And, again, we have an arm tied behind our back
2 because this witness has no documents between May 24, 2018 and
3 June 15, 2018. The idea that they're going to put her on to
4 talk about all of the -- anything when there's no documents,
5 and they've never explained that, they've never been -- and I
6 don't think anyone's going to say on the record as an officer
7 of the court, well, she had no emails or communications with
8 anybody during those 21 days or 22 days, because that would be
9 unbelievable. So we're going to now be put in the situation
10 where we have to depose and cross this witness when a key time
11 period right before the disclosure is absent from her custodial
12 file. That would be very, very unfair to us.

13 And I think I just -- and I just remembered also,
14 counsel said, well, why didn't you move for sanctions against
15 Maggie Kong and Jinsheng Lin back when you filed the Rule 37
16 motion. There was no reason to. We were focused on the
17 witnesses -- on the witness that was the focus. And we
18 never -- it never occurred to us they were going to call Maggie
19 Kong to testify. It never occurred to us that there would be
20 any reason to because they said she knows nothing.

21 So what happened was, when they disclosed the witness
22 the end of February, we then in our trial brief said we oppose
23 that witness being allowed to testify. We've done things when
24 we learned. We took our position, and I think I've explained
25 my position on the deposition.

1 THE COURT: Okay.

2 MR. SLATER: I don't want to go in circles with this.

3 THE COURT: Yeah.

4 MS. DAVIDSON: Your Honor, can I have 30 seconds?

5 THE COURT: You can have two minutes.

6 MS. DAVIDSON: I don't even need two minutes.

7 First of all, I just want to reassure you,
8 Mr. Slater, that Maggie, as you probably know from her resume,
9 Ms. Kong worked at Merck in New Jersey and has a green card.
10 So there's not going to be a problem for her coming to the U.S.

11 And secondly, I want to assure you that there's
12 nothing going on, there's no devious plan. This is all
13 speculation. It's almost like you've seen too many movies or
14 something, but there's no devious plan. There's no secret
15 reason why Ms. Kong is being brought to trial.

16 And, again, you will have -- if we are allowed to
17 bring Ms. Kong to trial, as Judge Vanaskie noted, there is an
18 opportunity to depose her. She would be happy to sit for a
19 deposition either before she comes or after she arrives. She,
20 as I understand it, is currently in Germany for work. So it's
21 a lot easier, Adam. She's not in China.

22 And, again, I think it's really important that
23 plaintiffs were awarded sanctions. Those sanctions did not say
24 that ZHP is barred from bringing witnesses to trial. And there
25 is not a basis that I've heard to keep her from coming to

1 trial.

2 There is -- apparently Adam believes he has a lot of
3 cross-examination, and that's fair game. That's all, Your
4 Honor.

5 THE COURT: All right. Thank you.

6 All right. Let's move to Jinsheng Lin then.

7 MR. SLATER: Your Honor, starting with Jinsheng Lin,
8 I think we have to remember that he was not named as a
9 custodian when ZHP was required to identify the people with
10 relevant knowledge. And, again, his deposition wasn't offered.
11 He wasn't named as a trial witness until right before the trial
12 either, in February of 2024.

13 It's very --

14 THE COURT: But you knew about him. You knew for --
15 at least for some time.

16 MR. SLATER: Oh, we knew about him for sure, and --

17 THE COURT: And, you know, I think it's a fair
18 characterization to say that the email he authored is the
19 centerpiece of your trial strategy. So why not notice the
20 deposition of the centerpiece of your trial strategy?

21 MR. SLATER: The reason we didn't do it was because
22 ZHP had never named him as a relevant custodian. Never named
23 him as a relevant witness. Never offered him for deposition.
24 And once we deposed the 30(b)(6) witness who spoke for the
25 company, Min Li, who was Jinsheng Lin's boss, and who received

1 that email and was speaking for the company, and he explained
2 what the email said, it didn't seem like there was a reason to
3 then go to Jinsheng Lin, who they had never listed as a witness
4 who was going to testify, they had never offered him for
5 deposition, didn't offer his custodial file, it didn't seem
6 necessary for us to go create testimony with him for the
7 benefit of ZHP when we had testimony from their 30(b)(6)
8 witness speaking for the company on this subject. It would
9 have been a big favor to them at that point because we had
10 binding testimony the company was bound by.

11 And I think one of the big problems that we have here
12 is, we're now told that he's going to -- the proffer is talk
13 about the meaning of the email, the intention in writing the
14 email, and his knowledge at the time the email was sent.

15 So essentially he's going to now -- I presume they
16 wouldn't be calling him to agree with Min Li about what it
17 says, so they're going to now try to bring in the witness to
18 say that their 30(b)(6) witness was wrong and that he disagrees
19 with the company's own testimony and the company's own
20 translation of the document so that the jury can be thoroughly
21 confused. I suppose that's the reason to call him.

22 And now let's talk about how prejudiced we would be
23 to depose him. His custodial file is materially deficient.
24 This is a guy who worked at the company for many years. I
25 think he started there in, I think, 2012 or 2013. It might be

1 2014 at the latest. And we have -- the earliest family date
2 for any of the documents is December 7, 2017. So, again, they
3 are, hey, go take the deposition of our witness for whom you
4 don't have any of his documents before December of 2017, when
5 that email was written, et cetera. And so with both hands tied
6 behind your back, ask him these questions.

7 And I can tell you, Judge, we have evidence that's
8 already going to go in -- we have testimony that's already
9 going to go into evidence from another 30(b)(6) witness that as
10 of July 13, 2017, 14 days before that email was written, CEMAT,
11 and this is testimony from Qiangming Li that was given on
12 April 16, 2021, that CEMAT was using GCMS, chromatography,
13 which is the type that is used to identify nitrosamines, to
14 identify unknown impurities in its valsartan API as of July 13,
15 2017.

16 Jinsheng Lin would have definitely been involved in
17 those activities. He ran the lab that looked for impurities in
18 their drugs, but we have no documentation of that at all.

19 We have no documentation of why he said that what
20 they're seeing in the irbesartan looks just like the NDMA
21 that's in valsartan and is caused by sodium nitrite quenching.
22 So we've never seen the documents that show why did he know
23 that. Because the idea that this was about some other product,
24 it's literally the information that this case turns on, and
25 it's literally the specific information, yet we have no

1 documents from him showing how did he learn that. When did he
2 know it? Who else did he discuss it with?

3 So they want us to depose him, but we don't have any
4 of his documents from that relevant time period, when we know
5 that CEMAT and his specific lab that he ran at CEMAT was using
6 the right kind of chromatography testing to identify unknown
7 impurities in valsartan in July of 2017, yet we have no
8 documents from his custodial file during that time period.

9 That's a very problematic, very prejudicial
10 situation. And, again, and I think I've answered your
11 question, I'm happy to answer more questions about why we
12 didn't jump up and say, well, now we'll depose him if you're
13 calling him as a witness. We did what we thought was right.
14 We moved to preclude his testimony.

15 Again, if they bring him to the U.S. and we lose this
16 argument, we would want to depose him. But we think that
17 there's also going to be -- well, I don't want to go further
18 than that other than to say --

19 THE COURT: All right. Can you answer this question
20 for me?

21 MR. SLATER: Yes.

22 THE COURT: To what extent, because this is an MDL,
23 and I'm not certain of the answer to this question, to what
24 extent is Rule 26(a)(1), I think it is, of the Federal Rules of
25 Civil Procedure applicable here, where you have to disclose the

1 identity of every person likely to have discoverable
2 information along with the subjects of that information and to
3 do it in a timely manner?

4 MR. SLATER: It does apply. It does apply, Your
5 Honor, and that's why they were told to identify those people
6 as the custodians that we would need, and it was never
7 disclosed.

8 THE COURT: Okay.

9 MR. SLATER: And I think there was a weird statement
10 in their brief, and I'm not sure what it is, counsel could
11 explain it maybe, where they said the plaintiffs know that we
12 didn't even know about this email back then.

13 I don't know what they -- I don't know that. I don't
14 know when they learned of it. I mean, you understand our view
15 on that email. You understand what we think happened. And
16 it's a big so what. And it does go back to Rule 26. All of
17 this was required to be investigated, identified, and disclosed
18 going back to the beginning when custodians were first being
19 identified in 2019.

20 THE COURT: All right. Jessica.

21 MS. DAVIDSON: Your Honor, ZHP learned about the
22 email at this deposition, the first deposition where the email
23 was used by plaintiffs' counsel. At that point, plaintiffs
24 made a decision that they were going to depose every single
25 person they could about this email except the author of the

1 email himself.

2 What we just heard from Mr. Slater was his closing
3 argument. His entire case is about this email. It's
4 unprecedented to me to allow plaintiffs to make their entire
5 case about an email but bar the jury from hearing from that
6 author.

7 The fact that plaintiffs decided from a strategic
8 perspective that they would have a stronger case about the
9 email if they didn't actually ask the person who wrote it why
10 did you write this, what did it mean, what were the
11 circumstances, whatever questions I would ask someone if I were
12 deposing somebody who wrote the email, the fact that plaintiffs
13 decided they weren't going to do that cannot be a basis for
14 barring ZHP from bringing the author of the email that they're
15 making their entire case about.

16 And I want to say that there's been an ongoing effort
17 in this litigation to make this a one-sided trial, constant
18 efforts to preclude ZHP from introducing this sort of evidence
19 or that sort of evidence and to box ZHP in. And I think the
20 Court has made very clear that this is going to be a fair
21 trial. We heard that multiple times from Judge Bumb when we
22 sat in court. This is going to be a fair trial.

23 And obviously, a fair trial can only happen if ZHP is
24 allowed to bring the person who wrote the email that
25 Mr. Slater's entire case is about.

1 I don't know how to say that any more emphatically.
2 And I am not aware of any situation where a court would bar the
3 defendant from bringing the person who wrote the email that the
4 entire trial strategy of the plaintiffs is about.

5 And I want to make one more point. Mr. Slater said
6 something earlier about and suggested that ZHP chose who would
7 be deposed early on. Obviously it was plaintiffs who chose who
8 would be deposed early on. And I did reach out actually, Your
9 Honor, to Duane Morris to say, hey, did ZHP choose all the
10 potential witnesses? And I was told, of course not. That's
11 not how it happened. And obviously we know that's not how it
12 happened since plaintiffs wanted to depose Mr. Chen. I don't
13 believe that ZHP put Mr. Chen down as a deponent and chose him
14 and then moved to block him from being deposed. So it's very
15 clear that plaintiffs chose whom to depose. They chose
16 carefully. They chose strategically. They had that right.
17 But conversely, we too have the right at trial to present a
18 full and fair defense, which includes bringing the person who
19 wrote the email that Mr. Slater has now questioned multiple
20 people about except the person himself.

21 THE COURT: All right.

22 MS. DAVIDSON: I'll leave it there.

23 THE COURT: Thank you.

24 Adam.

25 MR. SLATER: Yes, Judge.

1 We based our witnesses on who they told us had
2 knowledge and the things that we saw when they were giving us
3 the custodial files. And we did the best we could. We
4 obviously want to depose Baohua Chen.

5 I want to go back to something that counsel said.

6 THE COURT: Why did you choose not to depose Jinsheng
7 Lin after you learned of the existence of that email?

8 MR. SLATER: Well, as I said, once we learned of the
9 email, we took the deposition of Min Li, who was the 30(b)(6)
10 witness who addressed these issues. So we now have the company
11 testifying to the email. So there was no reason for us to now
12 go and take the deposition of this other witness who they had
13 never even disclosed to us and never showed any interest in
14 calling as a witness.

15 So we had good testimony that explained what the
16 email said. We weren't going to go and now take the deposition
17 of this Jinsheng Lin and let him say whatever he was going to
18 say. We didn't need to do that at that point because they were
19 locked in on what the email said. Because, again, the company
20 is bound by the admissions of the 30(b)(6) witness. So we had
21 it. And we had very clear testimony.

22 There's nothing that says just -- if we had said as
23 to the 30(b)(6) witnesses, okay, we deposed this witness, now
24 we want to go depose the other people who wrote the emails that
25 the person testified about, the response would be, no, that's

1 why you took a 30(b)(6) to cover that department, to cover that
2 subject matter. So we weren't required to go depose all of the
3 people that were in -- that had the roles and wrote the emails
4 and the documents that were within the designation.

5 I also think -- I think we shouldn't lose what
6 counsel said before. ZHP learned about the email at the first
7 deposition when it was used. That's impossible. ZHP and their
8 counsel were required to go through all the documents, make
9 sure all relevant documents were produced, and they're supposed
10 to be given to us. So I don't understand how counsel can
11 represent that ZHP didn't know what it produced to us or that
12 they missed a document which on their search would have shown
13 NDMA, valsartan, quenching, key search terms to look for any
14 highly relevant documents. They all would come up with that
15 document. I mean, it's interesting to think that our people
16 would find the document and figure out what it means before ZHP
17 did.

18 What happened with the document from our perspective
19 and our understanding is that document was never supposed to be
20 produced and it slipped through and was missed. That's why
21 there's no duplicate custodians. That's why it was a copy, a
22 PDF copy off a laptop. And that's why we got it the way we
23 did. So if ZHP was surprised when we used it at the deposition
24 of Min Li, they were surprised because they didn't think we had
25 it. And frankly, I don't even know who was involved in doing

1 that.

2 It may have been not that the U.S. counsel didn't
3 know. I have no idea, but it seemed pretty obvious what
4 happened.

5 I also would like to say, counsel acts as if this
6 email is the only thing that we have and it's the entire case.
7 The FDA never knew about the email because it was never
8 disclosed to the FDA even after the recall, even after all this
9 happened. And the FDA still imposed a recall. They wrote the
10 warning letter finding cGMP violations and adulteration and
11 imposed an import ban all without the email. So it's not our
12 entire case. It's an important piece of evidence within the
13 case, but it's not the whole case.

14 And, again, it's not our job to go take depositions
15 to make it easier for ZHP to deflect what their 30(b)(6)
16 witness said the document says.

17 So I don't think that that should be used against us
18 because I don't think that we were obligated to do it. And I
19 don't think that we needed to go take depositions of everybody
20 that was within the documents and actions that their 30(b)(6)
21 witnesses talked about.

22 THE COURT: All right. Thank you.

23 MS. DAVIDSON: Your Honor, if I may, two minutes.

24 THE COURT: You may.

25 MS. DAVIDSON: Thank you, Your Honor.

1 We heard a lot of conspiracy theories from
2 Mr. Slater, and I want to make clear that, and Your Honor knows
3 this, obviously conspiracy theories and speculation are not a
4 basis for telling a company that it cannot bring its employees
5 to trial.

6 And it's troubling to me that ZHP is being at this
7 point accused with no evidence of intentionally destroying
8 documents, of hiding documents.

9 I mean, as I said earlier, I feel like Mr. Slater has
10 watched a lot of TV shows because there's no evidence of this.
11 There's no -- it's all just conspiracy, speculation, with no
12 facts. And it seems to me that plaintiffs have chosen --
13 decided that that's how they want to try this case, with
14 conspiracy and speculation rather than facts.

15 Now, I thought it was interesting that Mr. Slater
16 said that Min Li was, quote, locked in. They locked in the
17 testimony with Min Li and therefore they didn't want to depose
18 Jinsheng Lin.

19 As Your Honor will recall, when Min Li was shown that
20 email at his deposition, he said he had never seen it before.
21 He didn't know what it was. So to surprise somebody with an
22 email that they don't know what it is and then tell the company
23 that the person who wrote the email can't come to trial to
24 testify about it because Min Li is locked in, that is -- and,
25 again, I go back to not wanting to overstate -- but that is

1 fundamentally a due process violation. I mean, this would be
2 baking prejudicial error into the trial.

3 And I do want to go back to something that, you know,
4 Judge Bumb said two things that I thought were very important.
5 Number one, we're going to have a fair trial. And number two,
6 I don't want to have a trial that has any baked-in error. I
7 want -- if we're going to have a trial, I want to make sure
8 that this does not get reversed.

9 Your Honor, I will submit, respectfully, that if you
10 have a trial about an email and the author of the email is not
11 allowed to testify, that is baked-in error.

12 MR. SLATER: Judge, I forgot to mention one thing,
13 and if I could just mention it, and then counsel obviously can
14 respond because I'd be interested in the response. Can I have
15 a moment just to add one thing that I forgot to mention?

16 THE COURT: Yes, you may. Yes.

17 MR. SLATER: Thank you.

18 As I started out, the burden of proof is on ZHP to
19 show that their nondisclosure is substantially justified or is
20 harmless. And one of the things I saw in their brief was
21 something about a records retention policy, and his emails were
22 scrubbed in the ordinary course.

23 We have emails for many, many witnesses going back
24 long before two years before the recall. They've never
25 explained why he was special and his documents would have been

1 scrubbed like that, and including not being able to produce the
2 email that he wrote. That's a real problem. They can't meet
3 their burden to explain this. They've never met it.

4 We've looked. We have not seen any retention policy
5 that required documents to be destroyed for Jinsheng Lin within
6 two years of it being -- less than two years of it being
7 written because the recall occurred less than two years after
8 the email was written. And certainly they were on notice of
9 potential litigation at that point. They were under
10 investigation by the FDA, et cetera.

11 So that's never been explained. They can't meet
12 their burden, and that's what this is about. There's a burden
13 of proof. They can't meet it.

14 And, again, we are horribly prejudiced by the lack of
15 documents and the clear -- there's no conspiracy. There's no
16 documents for the guy. The email he wrote isn't in his file.
17 He's not listed as a duplicate custodian, et cetera. So I
18 don't know what counsel can say to this records retention
19 policy issue. But it's never been fleshed out. It's just
20 something thrown into a brief, and we don't see any such policy
21 that would have just affected him and no one else.

22 MS. DAVIDSON: Your Honor, my response is very
23 succinct. I would suggest that Mr. Slater depose Jinsheng Lin
24 and ask him what happened to your documents and find out what
25 his policies were and how he kept his documents, how he deleted

1 his documents. I mean, that's how litigation works. That's
2 all.

3 MR. SLATER: But I think counsel has to answer the
4 question. The answer, I guess, is they don't want to say or
5 they don't know. And when they said there's a records
6 retention policy that applied, they can't point to it because
7 we can't find such a policy that allowed them to destroy the
8 document so quickly. So there is nothing.

9 MS. DAVIDSON: Again, Mr. Slater, I'm sorry, this is
10 all speculation that is a further example that plaintiffs'
11 counsel here want to try this case based on an innuendo,
12 innuendo rather than facts and evidence. Facts and evidence
13 are how trials, in my experience, happen. And witnesses are
14 identified. They are deposed. They testify. They're
15 cross-examined. That's how this should proceed.

16 THE COURT: All right. I certainly understand the
17 arguments.

18 You need a prompt ruling from me. I want to do a
19 ruling in writing on this because I think it's an important
20 issue.

21 I want to go back to basics, fundamentals. And
22 that's why I raised Rule 26 and the disclosure obligations in
23 Rule 26. And certainly if there's a violation of disclosure
24 obligations, a sanction can be preclusion. So witnesses get
25 precluded all the time. The due process is baked into the

1 rules. The rules require disclosure, and there is a penalty if
2 the disclosure is not made in a timely manner, or can be a
3 penalty. I'm not saying there will be. And that's how I'm
4 going to approach this for both Maggie Kong and Jinsheng Lin.

5 I am very much concerned that the circumstances
6 surrounding the disclosure of that Jinsheng Lin email from 2017
7 are suspect. I'll use that term.

8 It is an important piece of evidence that simply
9 somehow tumbled out, and that's concerning. Now, there's no
10 suggestion of anything nefarious. It's just -- it's a large
11 case, a lot of evidence. But I do want to look at this a
12 little more carefully. I want to get the transcript from the
13 argument because the arguments were extremely well presented,
14 and then give you a prompt ruling. And it will be a ruling in
15 writing. And I think that's all I have to say right now.

16 It will be decided based on the fundamentals of what
17 obligations exist in terms of disclosures, et cetera. And so
18 let me promise you a prompt ruling and do my best to get it out
19 as quickly as I can.

20 And, John, I'll look for this transcript as quickly
21 as you can get it to me.

22 THE COURT REPORTER: Yes, Your Honor.

23 THE COURT: Thanks.

24 All right. Anything else for today?

25 MR. SLATER: There's not, Judge. Thank you very

1 much.

2 THE COURT: Thank you all very much.

3 MS. DAVIDSON: Thank you, Your Honor.

4 MR. SLATER: Have a nice day.

5 THE COURT: Take care. Bye-bye.

6 MR. SLATER: Bye.

7 (Proceedings concluded at 10:54 a.m.)

8 - - - - -
9 **FEDERAL OFFICIAL COURT REPORTER'S CERTIFICATE**
10 - - - - -

11 I certify that the foregoing is a correct transcript
12 from the record of proceedings in the above-entitled matter.
13

14 /S/John J. Kurz, RDR-RMR-CRR-CRC

October 7, 2024

15 Court Reporter/Transcriber
16
17
18
19
20
21
22
23
24
25

<p>MR. SLATER: [26] 4/11 4/18 5/20 8/21 14/19 15/4 15/11 16/9 21/10 22/24 23/3 26/2 27/7 27/16 27/21 30/21 31/4 31/9 33/25 34/8 38/12 38/17 40/3 41/25 42/4 42/6</p> <p>MS. DAVIDSON: [19] 4/7 9/22 12/8 12/22 12/25 13/2 13/8 13/16 19/9 20/7 26/4 26/6 31/21 33/22 36/23 36/25 39/22 40/9 42/3</p> <p>THE COURT REPORTER: [2] 4/5 41/22</p> <p>THE COURT: [42] 4/4 4/6 4/9 4/12 5/13 8/20 9/21 12/6 12/9 12/24 13/1 13/7 13/15 14/15 15/3 15/9 16/7 19/7 20/6 21/8 22/9 23/2 26/1 26/3 26/5 27/5 27/14 27/17 30/19 30/22 31/8 31/20 33/21 33/23 34/6 36/22 36/24 38/16 40/16 41/23 42/2 42/5</p> <p>/</p> <p>/S/John [1] 42/14</p> <p>0</p> <p>07068 [1] 1/19 08101 [1] 1/9</p> <p>1</p> <p>100 [1] 11/9 10001 [1] 2/4 10022 [1] 2/12 103 [1] 1/18 10:00 [1] 1/10 10:00 a.m [1] 4/3 10:54 a.m [1] 42/7 11 [1] 2/22 1100 [1] 1/15 128 [1] 2/3 13 [2] 29/10 29/14 14 [1] 29/10 1440 [1] 2/7 15 [4] 9/6 15/19 21/24 25/3 1515 [1] 1/15 15219 [1] 2/16 16 [1] 29/12 18 [1] 10/6 19102 [1] 1/15 1:19-md-02875-RMB-SA K [1] 1/4</p> <p>2</p> <p>2,497 [2] 14/19 15/8 2,500-document [1] 15/10 20 [2] 5/14 22/20 20/20 [2] 5/14 22/20</p>	<p>20005 [1] 2/8 2012 [1] 28/25 2013 [1] 28/25 2014 [1] 29/1 2017 [6] 29/2 29/4 29/10 29/15 30/7 41/6 2018 [9] 9/6 9/6 10/24 15/19 15/19 21/24 21/24 25/2 25/3 2019 [1] 31/19 2021 [2] 17/11 29/12 2024 [3] 1/9 27/12 42/14 207 [1] 1/18 21 [1] 25/8 22 days [1] 25/8 2200 [1] 3/9 2220 [1] 3/6 22nd [1] 6/1 230 [1] 3/6 24 [4] 9/6 15/19 21/24 25/2 2500 [1] 2/18 26 [4] 30/24 31/16 40/22 40/23 2800 [1] 3/3</p> <p>3</p> <p>30 [15] 16/15 16/16 17/17 18/11 26/4 27/24 28/7 28/18 29/9 34/9 34/20 34/23 35/1 36/15 36/20 30305 [1] 2/19 3333 [1] 2/18 3600 [1] 3/9 37 [1] 25/15 38th [1] 2/15</p> <p>4</p> <p>42-128 [1] 2/3 45202 [1] 3/3 46204 [1] 2/23 4th [1] 1/8</p> <p>5</p> <p>50,000 [1] 14/20 57,000 [7] 10/3 10/6 10/9 14/16 14/18 14/20 15/7 576-7094 [1] 1/22</p> <p>6</p> <p>6/1/18 [1] 10/6 600 [1] 3/3 601 [1] 2/12 60606 [1] 3/6</p> <p>7</p> <p>7094 [1] 1/22 75201 [1] 3/10</p> <p>8</p> <p>856 [1] 1/22</p> <p>A</p> <p>a.m [3] 1/10 4/3 42/7 ability [2] 21/1 21/1 able [6] 7/3 8/12 17/20 24/12 24/17 39/1</p>	<p>above [1] 42/11 above-entitled [1] 42/11 absent [1] 25/11 absolutely [3] 6/20 9/14 18/23 accused [1] 37/7 act [1] 17/14 Actavis [2] 2/20 2/20 action [5] 1/3 5/16 5/20 5/24 7/12 actions [1] 36/20 activities [1] 29/17 activity [2] 22/21 22/21 acts [1] 36/5 actual [1] 6/7 actually [13] 6/2 8/25 15/11 15/13 17/19 17/20 19/3 21/17 21/17 24/12 24/13 32/9 33/8 ad [1] 9/24 ADAM [10] 1/17 4/11 4/12 14/7 14/15 19/15 21/9 26/21 27/2 33/24 add [1] 38/15 addressed [2] 21/4 34/10 administrative [3] 12/13 13/22 18/14 admissible [1] 19/3 admissions [1] 34/20 adulteration [1] 36/10 adverse [2] 11/11 11/18 affected [1] 39/21 affirmatively [2] 16/16 18/10 after [16] 7/23 10/4 10/24 14/1 14/2 14/12 16/14 17/11 17/24 22/18 24/19 26/19 34/7 36/8 36/8 39/7 again [16] 7/22 22/5 24/5 24/19 25/1 26/16 26/22 27/10 29/2 30/10 30/15 34/19 36/14 37/25 39/14 40/9 against [2] 25/14 36/17 ago [6] 7/9 8/16 12/23 13/3 19/16 22/12 agree [2] 22/10 28/16 aided [1] 1/24 ALEXIA [1] 2/11 ALFANO [1] 2/14 all [62] ALLON [1] 2/11 allow [4] 20/15 23/15 23/23 32/4 allowed [10] 11/2 19/1 23/7 23/25 24/11 25/23 26/16 32/24 38/11 40/7 almost [1] 26/13 along [2] 6/10 31/2 already [3] 18/2 29/8 29/8 also [16] 3/12 5/2 5/2 6/25 7/12 7/14 8/5 8/17 10/14 10/23 16/10 20/1 25/13 30/17 35/5 36/5 always [1] 8/21</p>	<p>am [4] 10/25 20/1 33/2 41/5 AmerisourceBergen [1] 3/4 analysis [1] 20/24 another [1] 29/9 answer [6] 22/24 30/11 30/19 30/23 40/3 40/4 answered [1] 30/10 any [23] 8/18 11/13 12/12 13/22 14/7 14/11 16/18 19/17 22/2 23/18 24/22 24/24 25/20 29/2 29/4 30/3 33/1 33/2 34/13 35/13 38/6 39/4 39/20 anybody [2] 12/14 25/8 anyone's [1] 25/6 anything [15] 6/20 6/22 6/23 7/21 10/24 11/1 15/18 16/19 18/4 24/18 24/18 24/21 25/4 41/10 41/24 anyway [1] 15/17 API [1] 29/14 apparently [1] 27/2 applicable [1] 30/25 applied [1] 40/6 apply [6] 5/3 20/8 20/9 20/13 31/4 31/4 approach [1] 41/4 April [1] 29/12 April 16 [1] 29/12 are [19] 5/3 11/11 16/11 16/25 17/21 17/21 19/5 20/13 20/19 20/21 23/6 26/16 29/3 37/3 39/14 40/13 40/13 40/14 41/7 areas [5] 7/6 16/19 16/24 22/2 23/18 argument [8] 1/5 4/14 9/20 10/7 11/7 30/16 32/3 41/13 arguments [3] 12/10 40/17 41/13 arm [1] 25/1 arose [1] 5/14 around [2] 9/16 9/16 ARPS [2] 2/2 2/6 Arps' [1] 15/25 arrives [1] 26/19 ask [8] 12/6 13/6 21/18 24/12 29/6 32/9 32/11 39/24 asked [4] 17/23 21/6 22/5 22/8 asking [1] 11/21 assignment [1] 5/18 assistant [2] 12/14 18/14 assume [1] 12/19 assure [1] 26/11 Atlanta [1] 2/19 attorneys [1] 13/17 author [4] 31/25 32/6 32/14 38/10 authored [1] 27/18 available [3] 19/16 19/17 21/2</p>	<p>availed [1] 22/22 Avenue [3] 2/7 2/12 3/9 awaiting [1] 5/17 awarded [1] 26/23 aware [1] 33/2 away [1] 11/24</p> <p>B</p> <p>back [17] 7/19 14/24 15/6 21/6 22/11 24/8 25/1 25/15 29/6 31/12 31/16 31/18 34/5 37/25 38/3 38/23 40/21 background [1] 12/9 bad [1] 5/5 bail [1] 21/10 baited [1] 24/5 baked [3] 38/6 38/11 40/25 baked-in [2] 38/6 38/11 baking [1] 38/2 ban [3] 8/7 14/3 36/11 bandy [1] 10/16 Baohua [13] 7/2 7/4 7/23 9/11 9/16 12/12 12/17 15/5 16/21 18/19 22/14 22/15 34/4 bar [3] 12/5 32/5 33/2 BARNES [1] 2/21 barred [2] 11/16 26/24 barring [3] 11/19 11/22 32/14 based [7] 4/23 11/14 16/20 22/10 34/1 40/11 41/16 basically [5] 10/2 10/24 11/6 11/20 19/20 basics [1] 40/21 basis [4] 12/4 26/25 32/13 37/4 because [44] become [3] 7/22 21/20 24/14 becomes [1] 23/11 been [17] 6/7 11/13 14/23 17/18 17/18 17/24 21/4 22/6 22/25 25/5 28/9 29/16 32/16 36/2 38/25 39/11 39/19 before [19] 4/2 6/1 6/8 7/19 8/19 13/13 17/2 18/25 20/2 25/11 26/19 27/11 29/4 29/10 35/6 35/16 37/20 38/24 38/24 beginning [2] 10/6 31/18 behalf [2] 16/2 16/17 behind [2] 25/1 29/6 being [14] 8/1 17/3 17/15 17/16 18/18 24/17 25/23 26/15 31/18 33/14 37/6 39/1 39/6 39/6 believe [2] 5/25 33/13 believes [2] 20/21 27/2 benefit [2] 19/21 28/7 Bernardo [1] 20/23 BERNE [1] 3/2 best [2] 34/3 41/18</p>
---	---	--	--	--

<p>B</p> <p>between [4] 15/19 20/25 21/24 25/2</p> <p>beyond [1] 23/25</p> <p>big [4] 7/2 28/9 28/11 31/16</p> <p>binding [1] 28/10</p> <p>bit [2] 12/15 15/15</p> <p>blank [1] 8/15</p> <p>block [3] 17/3 22/25 33/14</p> <p>blow [1] 18/20</p> <p>BOSICK [1] 2/14</p> <p>boss [1] 27/25</p> <p>both [3] 10/8 29/5 41/4</p> <p>bound [2] 28/10 34/20</p> <p>box [1] 32/19</p> <p>BRANCATO [1] 2/11</p> <p>break [3] 16/6 16/7 19/20</p> <p>brief [7] 7/5 8/4 22/25 25/22 31/10 38/20 39/20</p> <p>briefed [1] 4/16</p> <p>Briefly [1] 19/9</p> <p>briefs [6] 6/4 6/16 6/17 7/6 9/2 17/5</p> <p>bring [8] 10/10 10/17 10/21 26/17 28/17 30/15 32/24 37/4</p> <p>bringing [5] 11/17 26/24 32/14 33/3 33/18</p> <p>broad [1] 11/1</p> <p>brought [1] 26/15</p> <p>Building [1] 1/8</p> <p>Bumb [5] 5/7 20/14 20/15 32/21 38/4</p> <p>burden [6] 4/23 4/25 38/18 39/3 39/12 39/12</p> <p>bye [3] 42/5 42/5 42/6</p> <p>Bye-bye [1] 42/5</p>	<p>carefully [2] 33/16 41/12</p> <p>case [21] 4/23 5/4 5/15 6/21 10/12 11/15 13/10 16/19 29/24 32/3 32/5 32/8 32/15 32/25 36/6 36/12 36/13 36/13 37/13 40/11 41/11</p> <p>cases [1] 5/3</p> <p>caused [1] 29/21</p> <p>CEMAT [4] 29/10 29/12 30/5 30/5</p> <p>centerpiece [2] 27/19 27/20</p> <p>Centre [1] 2/15</p> <p>certain [1] 30/23</p> <p>certainly [6] 18/11 23/3 23/14 39/8 40/16 40/23</p> <p>CERTIFICATE [1] 42/8</p> <p>certification [1] 20/24</p> <p>certified [1] 20/22</p> <p>certify [1] 42/10</p> <p>cetera [5] 15/14 29/5 39/10 39/17 41/17</p> <p>cGMP [1] 36/10</p> <p>change [1] 13/8</p> <p>characterization [1] 27/18</p> <p>chart [2] 8/19 8/24</p> <p>check [1] 21/6</p> <p>Chen [14] 7/2 7/4 7/23 9/11 9/16 12/17 15/5 16/21 18/19 22/14 22/15 33/12 33/13 34/4</p> <p>Chen's [1] 12/12</p> <p>Chicago [1] 3/6</p> <p>chief [8] 6/21 8/21 9/2 12/12 12/17 13/19 13/20 18/14</p> <p>China [1] 26/21</p> <p>choice [2] 19/23 19/24</p> <p>choose [4] 10/9 12/5 33/9 34/6</p> <p>chose [8] 10/18 20/12 33/6 33/7 33/13 33/15 33/15 33/16</p> <p>chosen [3] 11/17 21/3 37/12</p> <p>CHRISTOPHER [1] 1/18</p> <p>chromatography [2] 29/12 30/6</p> <p>Cincinnati [1] 3/3</p> <p>circles [1] 26/2</p> <p>circumstances [3] 11/15 32/11 41/5</p> <p>cited [2] 4/23 5/2</p> <p>CIVIL [2] 1/3 30/25</p> <p>claim [1] 5/22</p> <p>clear [9] 4/9 6/12 20/14 20/17 32/20 33/15 34/21 37/2 39/15</p> <p>Clerk [1] 3/14</p> <p>client [1] 9/9</p> <p>clients [1] 9/8</p> <p>closing [1] 32/2</p> <p>Co [4] 1/16 1/19 2/4 2/8</p> <p>Co-Lead [2] 1/16 1/19</p>	<p>Cohen [1] 1/8</p> <p>colleague [1] 20/23</p> <p>Collecting [1] 8/2</p> <p>collection [1] 10/7</p> <p>collectively [4] 2/5 2/9 2/13 2/20</p> <p>come [6] 6/2 7/3 14/5 14/6 35/14 37/23</p> <p>comes [5] 14/20 14/21 15/7 18/21 26/19</p> <p>comfortable [1] 20/4</p> <p>coming [6] 7/19 9/12 12/5 19/17 26/10 26/25</p> <p>Commencing [1] 1/10</p> <p>commented [1] 5/8</p> <p>commenting [1] 20/4</p> <p>communications [2] 9/7 25/7</p> <p>company [19] 8/7 10/17 14/1 14/12 14/13 16/14 16/17 16/17 18/9 18/9 27/25 28/1 28/8 28/10 28/24 34/10 34/19 37/4 37/22</p> <p>company's [2] 28/19 28/19</p> <p>completely [3] 23/15 23/17 23/20</p> <p>computer [1] 1/24</p> <p>computer-aided [1] 1/24</p> <p>concern [2] 5/24 7/3</p> <p>concerned [4] 20/10 20/18 20/20 41/5</p> <p>concerning [1] 41/9</p> <p>concerns [1] 21/4</p> <p>concluded [1] 42/7</p> <p>conduct [1] 16/2</p> <p>conduit [2] 22/13 22/16</p> <p>confirm [1] 21/7</p> <p>confused [1] 28/21</p> <p>connotation [1] 12/18</p> <p>conspiracy [5] 37/1 37/3 37/11 37/14 39/15</p> <p>constant [1] 32/17</p> <p>contacting [1] 7/15</p> <p>Continued [2] 2/1 3/1</p> <p>conversely [1] 33/17</p> <p>Cooper [1] 1/8</p> <p>copy [2] 35/21 35/22</p> <p>Corp [1] 3/10</p> <p>correct [2] 23/12 42/10</p> <p>could [8] 5/22 11/1 22/8 22/22 31/10 31/25 34/3 38/13</p> <p>couldn't [1] 8/24</p> <p>counsel [29] 1/16 1/19 2/4 2/8 2/13 2/16 2/19 2/23 3/4 3/7 3/10 9/1 9/25 15/23 16/13 16/24 25/14 31/10 31/23 34/5 35/6 35/8 35/10 36/2 36/5 38/13 39/18 40/3 40/11</p> <p>country [1] 19/4</p> <p>couple [3] 4/19 12/6 15/24</p> <p>course [5] 5/14 5/16 17/1 33/10 38/22</p>	<p>court [18] 1/1 1/21 6/7 11/9 17/10 17/25 19/20 20/2 20/15 21/7 23/9 23/24 25/7 32/20 32/22 33/2 42/8 42/15</p> <p>Court's [1] 23/23</p> <p>Courthouse [1] 1/8</p> <p>Courtroom [1] 3/13</p> <p>courts [1] 23/8</p> <p>cover [2] 35/1 35/1</p> <p>CRC [1] 42/14</p> <p>create [2] 6/6 28/6</p> <p>critical [1] 9/6</p> <p>cross [9] 6/13 10/20 10/22 20/25 21/1 21/15 25/10 27/3 40/15</p> <p>cross-examination [3] 6/13 21/15 27/3</p> <p>cross-examine [4] 10/20 10/22 20/25 21/1</p> <p>cross-examined [1] 40/15</p> <p>CRR [1] 42/14</p> <p>cure [1] 6/5</p> <p>cured [2] 6/9 21/14</p> <p>current [1] 16/4</p> <p>currently [1] 26/20</p> <p>custodial [9] 6/18 7/1 9/4 17/3 25/11 28/5 28/23 30/8 34/3</p> <p>custodian [3] 27/9 27/22 39/17</p> <p>custodians [4] 17/21 31/6 31/18 35/21</p> <p>customers [2] 7/13 7/15</p> <p>CVS [1] 2/23</p>	<p>depose [24] 17/20 19/18 19/19 20/12 21/22 21/22 22/7 24/4 24/12 25/10 26/18 28/23 30/3 30/12 30/16 31/24 33/12 33/15 34/4 34/6 34/24 35/2 37/17 39/23</p> <p>deposed [8] 17/18 17/18 27/24 33/7 33/8 33/14 34/23 40/14</p> <p>deposing [2] 19/25 32/12</p> <p>deposition [39] 6/5 6/10 6/13 7/20 17/23 18/2 18/5 18/20 19/2 19/14 19/17 19/21 21/2 21/9 21/11 21/13 21/18 22/5 22/10 22/17 22/20 23/4 24/6 24/8 25/25 26/19 27/10 27/20 27/23 28/5 29/3 31/22 31/22 34/9 34/12 34/16 35/7 35/23 37/20</p> <p>depositions [6] 5/19 5/21 5/23 18/3 36/14 36/19</p> <p>Deputy [1] 3/13</p> <p>describe [1] 13/22</p> <p>described [1] 12/13</p> <p>describing [1] 13/13</p> <p>designated [4] 16/18 17/19 18/10 22/19</p> <p>designation [1] 35/4</p> <p>destroy [1] 40/7</p> <p>destroyed [1] 39/5</p> <p>destroying [1] 37/7</p> <p>details [1] 13/5</p> <p>development [7] 6/23 7/7 8/10 8/22 12/20 14/6 14/8</p> <p>devious [2] 26/12 26/14</p> <p>DEVORA [1] 2/11</p> <p>did [34] 5/20 5/24 12/11 12/19 14/12 16/3 16/4 16/14 16/17 16/21 16/21 16/22 16/22 16/22 16/23 17/15 18/9 18/13 18/25 20/24 26/23 29/22 30/1 30/1 30/2 30/13 32/10 32/10 33/8 33/9 34/3 34/6 35/17 35/23</p> <p>didn't [26] 5/16 5/16 6/18 7/22 8/16 13/6 13/17 18/17 18/22 20/4 20/5 24/18 25/14 27/21 28/2 28/5 28/5 30/12 31/12 32/9 34/18 35/11 35/24 36/2 37/17 37/21</p> <p>different [1] 11/19</p> <p>direct [1] 24/9</p> <p>disagrees [1] 28/18</p> <p>disclose [2] 4/21 30/25</p> <p>disclosed [7] 6/2 19/15 25/21 31/7 31/17 34/13 36/8</p> <p>disclosure [7] 8/1 25/11 40/22 40/23 41/1 41/2 41/6</p> <p>disclosures [1] 41/17</p> <p>discoverable [1] 31/1</p> <p>discovered [2] 13/25 14/2</p>
<p>C</p> <p>calendar [2] 6/22 18/17</p> <p>call [4] 18/25 24/17 25/18 28/21</p> <p>calling [3] 28/16 30/13 34/14</p> <p>Camden [1] 1/9</p> <p>came [3] 6/3 6/8 20/3</p> <p>can [32] 4/7 4/25 6/9 6/12 8/11 8/14 8/15 11/18 12/3 13/12 13/18 16/15 20/25 21/13 21/14 21/14 21/16 22/1 26/4 26/5 28/20 29/7 30/19 32/23 35/10 38/13 38/14 39/18 40/24 41/2 41/19 41/21</p> <p>can't [20] 5/9 8/18 13/16 16/4 16/5 16/16 18/9 18/10 18/11 18/16 19/3 21/22 24/7 24/14 37/23 39/2 39/11 39/13 40/6 40/7</p> <p>cannot [3] 10/17 32/13 37/4</p> <p>Capitol [1] 13/21</p> <p>card [1] 26/9</p> <p>care [1] 42/5</p>	<p>calendar [2] 6/22 18/17</p> <p>call [4] 18/25 24/17 25/18 28/21</p> <p>calling [3] 28/16 30/13 34/14</p> <p>Camden [1] 1/9</p> <p>came [3] 6/3 6/8 20/3</p> <p>can [32] 4/7 4/25 6/9 6/12 8/11 8/14 8/15 11/18 12/3 13/12 13/18 16/15 20/25 21/13 21/14 21/14 21/16 22/1 26/4 26/5 28/20 29/7 30/19 32/23 35/10 38/13 38/14 39/18 40/24 41/2 41/19 41/21</p> <p>can't [20] 5/9 8/18 13/16 16/4 16/5 16/16 18/9 18/10 18/11 18/16 19/3 21/22 24/7 24/14 37/23 39/2 39/11 39/13 40/6 40/7</p> <p>cannot [3] 10/17 32/13 37/4</p> <p>Capitol [1] 13/21</p> <p>card [1] 26/9</p> <p>care [1] 42/5</p>	<p>calendar [2] 6/22 18/17</p> <p>call [4] 18/25 24/17 25/18 28/21</p> <p>calling [3] 28/16 30/13 34/14</p> <p>Camden [1] 1/9</p> <p>came [3] 6/3 6/8 20/3</p> <p>can [32] 4/7 4/25 6/9 6/12 8/11 8/14 8/15 11/18 12/3 13/12 13/18 16/15 20/25 21/13 21/14 21/14 21/16 22/1 26/4 26/5 28/20 29/7 30/19 32/23 35/10 38/13 38/14 39/18 40/24 41/2 41/19 41/21</p> <p>can't [20] 5/9 8/18 13/16 16/4 16/5 16/16 18/9 18/10 18/11 18/16 19/3 21/22 24/7 24/14 37/23 39/2 39/11 39/13 40/6 40/7</p> <p>cannot [3] 10/17 32/13 37/4</p> <p>Capitol [1] 13/21</p> <p>card [1] 26/9</p> <p>care [1] 42/5</p>	<p>D</p> <p>D'LESLI [1] 3/8</p> <p>D.C [1] 2/8</p> <p>Dallas [1] 3/10</p> <p>date [1] 29/1</p> <p>DAVIDSON [1] 2/3</p> <p>DAVIS [1] 3/8</p> <p>day [3] 14/1 14/1 42/4</p> <p>days [3] 25/8 25/8 29/10</p> <p>December [2] 29/2 29/4</p> <p>December 7 [1] 29/2</p> <p>decide [1] 11/14</p> <p>decided [4] 32/7 32/13 37/13 41/16</p> <p>decides [1] 10/12</p> <p>decision [2] 19/19 31/24</p> <p>defendant [5] 2/16 3/7 3/10 5/8 33/3</p> <p>Defendants [6] 2/4 2/8 2/13 2/19 2/23 3/4</p> <p>defense [5] 6/18 9/18 18/3 22/5 33/18</p> <p>deficient [1] 28/23</p> <p>define [1] 10/25</p> <p>definitely [1] 29/16</p> <p>definition [1] 11/3</p> <p>deflect [1] 36/15</p> <p>deleted [1] 39/25</p> <p>Denmark [1] 15/20</p> <p>department [1] 35/1</p> <p>deponent [1] 33/13</p>	<p>D</p> <p>D'LESLI [1] 3/8</p> <p>D.C [1] 2/8</p> <p>Dallas [1] 3/10</p> <p>date [1] 29/1</p> <p>DAVIDSON [1] 2/3</p> <p>DAVIS [1] 3/8</p> <p>day [3] 14/1 14/1 42/4</p> <p>days [3] 25/8 25/8 29/10</p> <p>December [2] 29/2 29/4</p> <p>December 7 [1] 29/2</p> <p>decide [1] 11/14</p> <p>decided [4] 32/7 32/13 37/13 41/16</p> <p>decides [1] 10/12</p> <p>decision [2] 19/19 31/24</p> <p>defendant [5] 2/16 3/7 3/10 5/8 33/3</p> <p>Defendants [6] 2/4 2/8 2/13 2/19 2/23 3/4</p> <p>defense [5] 6/18 9/18 18/3 22/5 33/18</p> <p>deficient [1] 28/23</p> <p>define [1] 10/25</p> <p>definitely [1] 29/16</p> <p>definition [1] 11/3</p> <p>deflect [1] 36/15</p> <p>deleted [1] 39/25</p> <p>Denmark [1] 15/20</p> <p>department [1] 35/1</p> <p>deponent [1] 33/13</p>

D	28/14 28/14 29/5 29/10 31/12 31/15 31/22 31/22 31/25 32/1 32/3 32/5 32/9 32/12 32/14 32/24 33/3 33/19 34/7 34/9 34/11 34/16 34/19 35/6 36/6 36/7 36/11 37/20 37/22 37/23 38/10 38/10 39/2 39/8 39/16 41/6 emails [5] 25/7 34/24 35/3 38/21 38/23 emphatically [1] 33/1 employees [2] 10/18 37/4 enable [1] 19/21 end [2] 5/7 25/22 ensure [1] 8/9 enter [1] 11/22 entered [2] 11/8 11/9 entire [8] 24/9 32/3 32/4 32/15 32/25 33/4 36/6 36/12 entitled [1] 42/11 equity [1] 23/8 error [3] 38/2 38/6 38/11 ESQUIRE [13] 1/14 1/17 1/18 2/3 2/7 2/11 2/15 2/18 2/22 3/2 3/5 3/8 3/14 essentially [1] 28/15 estoppel [3] 23/21 23/21 23/22 et [5] 15/14 29/5 39/10 39/17 41/17 Europe [2] 13/4 13/10 even [12] 6/18 6/22 9/11 16/16 18/10 19/12 26/6 31/12 34/13 35/25 36/8 36/8 events [3] 13/13 14/12 17/11 ever [1] 9/14 every [3] 21/3 31/1 31/24 everybody [2] 18/23 36/19 everything [6] 6/25 17/13 17/14 21/14 21/14 22/3 evidence [18] 11/12 11/19 11/22 11/24 20/8 20/12 21/1 29/7 29/9 32/18 32/19 36/12 37/7 37/10 40/12 40/12 41/8 41/11 evidence-barring [2] 11/19 11/22 exactly [1] 13/16 examination [3] 6/13 21/15 27/3 examine [4] 10/20 10/22 20/25 21/1 examined [1] 40/15 example [2] 21/24 40/10 except [2] 31/25 33/20 exist [1] 41/17 existed [1] 21/23 existence [1] 34/7 experience [1] 40/13 explain [2] 31/11 39/3 explained [7] 23/6 25/5	25/24 28/1 34/15 38/25 39/11 extensively [1] 4/16 extent [5] 20/17 20/20 24/11 30/22 30/24 extremely [1] 41/13	F faced [1] 6/17 fact [5] 9/4 11/23 16/18 32/7 32/12 facts [5] 11/15 37/12 37/14 40/12 40/12 failed [1] 4/21 fair [8] 24/15 27/3 27/17 32/20 32/22 32/23 33/18 38/5 faith [1] 5/5 FALKENBERG [1] 3/5 family [1] 29/1 fashion [1] 4/22 fast [1] 19/13 faulting [2] 22/9 22/17 favor [1] 28/9 FDA [6] 17/15 17/16 36/7 36/8 36/9 39/10 February [3] 6/1 25/22 27/12 February 22nd [1] 6/1 federal [3] 20/19 30/24 42/8 feel [4] 10/15 20/4 23/4 37/9 felt [1] 6/4 few [2] 18/24 21/19 figure [1] 35/16 figured [1] 8/14 file [12] 6/3 7/1 9/4 14/16 17/3 20/21 21/23 25/12 28/5 28/23 30/8 39/16 filed [2] 17/5 25/15 files [1] 34/3 fill [1] 16/5 Finally [1] 11/5 find [6] 8/18 8/24 18/24 35/16 39/24 40/7 finding [2] 5/4 36/10 first [7] 4/17 16/15 19/11 26/7 31/18 31/22 35/6 firsthand [1] 22/13 fit [1] 12/22 fits [1] 12/21 five [1] 14/7 fix [1] 21/14 fleshed [1] 39/19 flip [1] 23/20 FLOM [2] 2/2 2/6 Floor [1] 2/15 focus [1] 25/17 focused [2] 17/22 25/16 follows [1] 4/3 forego [1] 21/3 foregoing [1] 42/10 forget [1] 23/20 forgot [2] 38/12 38/15 forthrightness [1] 5/5 found [1] 5/25	foundational [1] 4/20 frankly [1] 35/25 FREEMAN [1] 1/17 FULBRIGHT [1] 3/8 full [2] 20/24 33/18 fully [1] 5/4 fundamentally [1] 38/1 fundamentals [2] 40/21 41/16 further [2] 30/17 40/10	G gain [1] 5/9 game [1] 27/3 gamesmanship [5] 8/13 9/23 10/1 10/14 11/4 gap [1] 16/5 gaps [1] 21/22 gave [3] 6/19 8/25 22/15 GCMS [1] 29/12 Ge [1] 9/11 GEDDIS [1] 1/18 general [1] 5/2 GEOPPINGER [1] 3/2 Georgia [1] 2/19 Germany [1] 26/20 gets [1] 24/12 getting [1] 16/7 give [4] 7/22 8/3 19/20 41/14 given [2] 29/11 35/10 giving [1] 34/2 globalization [2] 8/22 12/20 goes [1] 7/13 good [8] 4/4 4/5 4/6 4/7 4/9 4/12 10/11 34/15 GORDON [1] 2/14 got [5] 10/8 10/8 12/23 20/23 35/22 green [1] 26/9 GREENBERG [1] 2/17 guess [4] 4/13 15/4 22/18 40/4 guy [2] 28/24 39/16	haven't [1] 9/1 having [4] 5/11 6/10 10/5 12/10 he [38] 10/2 10/8 10/8 10/11 10/20 10/22 12/2 12/3 19/13 19/19 19/23 19/23 20/11 20/12 20/21 27/2 27/8 27/11 27/18 28/1 28/18 28/25 29/17 29/19 29/22 30/1 30/1 30/2 30/5 34/17 37/20 37/20 37/21 38/25 39/2 39/16 39/25 39/25 he's [5] 20/20 21/3 28/12 28/15 39/17 head [1] 17/17 heading [1] 7/11 Healthcare [2] 2/5 2/9 hear [4] 4/8 4/17 9/21 19/7 heard [7] 11/6 15/15 15/24 26/25 32/2 32/21 37/1 hearing [3] 16/11 24/19 32/5 hearsay [1] 20/16 held [2] 4/1 14/24 Hello [1] 4/11 help [1] 15/18 her [54] here [17] 5/3 5/10 9/15 10/1 11/4 11/25 12/21 12/22 17/7 18/18 19/22 21/17 24/7 24/25 28/11 30/25 40/11 hesitate [3] 10/13 10/13 10/14 hey [2] 29/3 33/9 hiding [1] 37/8 high [1] 11/22 highlight [1] 4/19 highly [1] 35/14 Hill [1] 13/21 him [26] 18/20 19/20 19/21 21/2 27/14 27/16 27/22 27/23 27/23 28/4 28/6 28/16 28/21 28/23 29/6 30/1 30/3 30/12 30/13 30/15 30/16 33/13 33/14 34/17 39/21 39/24 himself [2] 32/1 33/20 hindsight [2] 5/14 22/20 his [22] 10/12 11/3 18/20 21/4 27/10 28/5 28/14 28/23 29/4 30/4 30/5 30/8 30/14 32/2 32/3 37/20 38/21 38/25 39/16 39/25 39/25 40/1 history [1] 6/8 hold [1] 15/6 hominem [1] 9/24 HONIK [2] 1/14 1/14 Honor [32] 4/5 4/7 4/18 6/17 7/8 8/17 9/22 11/5 11/21 11/23 11/23 13/11 15/12 19/10 20/1 20/7 21/16 23/9 26/4 27/4 27/7
----------	--	--	---	---	--	---

<p>H Honor... [11] 31/5 31/21 33/9 36/23 36/25 37/2 37/19 38/9 39/22 41/22 42/3 HONORABLE [3] 1/11 3/14 4/2 hope [2] 20/1 24/2 hoping [1] 19/20 horribly [1] 39/14 hours [1] 21/19 Huahai [4] 2/4 2/5 2/8 2/9 Humana [1] 3/7</p> <hr/> <p>I I'd [3] 8/17 12/20 38/14 I'll [6] 5/2 5/11 21/11 33/22 41/7 41/20 I'm [16] 4/17 7/15 8/3 8/25 14/19 17/25 20/3 22/9 22/16 22/18 30/11 30/23 31/10 40/9 41/3 41/3 I've [4] 15/24 25/24 26/25 30/10 idea [4] 23/9 25/3 29/23 36/3 identified [3] 31/17 31/19 40/14 identify [5] 27/9 29/13 29/14 30/6 31/5 identity [1] 31/1 Illinois [1] 3/6 immediately [2] 6/3 19/16 import [3] 8/7 14/3 36/11 important [11] 4/20 6/16 9/9 11/6 11/10 15/21 26/22 36/12 38/4 40/19 41/8 imposed [2] 36/9 36/11 impossible [1] 35/7 impurities [5] 8/2 13/25 29/14 29/17 30/7 Inc [9] 2/5 2/5 2/9 2/9 2/13 2/16 2/20 2/20 2/23 includes [1] 33/18 including [1] 39/1 Indianapolis [1] 2/23 Industries [1] 2/19 infer [1] 11/12 inference [3] 11/11 11/14 11/18 information [9] 4/21 8/3 12/12 22/14 22/15 29/24 29/25 31/2 31/2 innuendo [2] 40/11 40/12 integrity [1] 20/24 intended [1] 6/2 intention [1] 28/13 intentionally [1] 37/7 interacts [1] 15/1 interest [1] 34/13 interested [1] 38/14 interesting [3] 16/11 35/15 37/15</p>	<p>interim [1] 23/4 interrupt [1] 5/13 introducing [1] 32/18 investigated [1] 31/17 investigation [1] 39/10 involved [8] 9/10 14/1 14/3 14/10 14/11 24/19 29/16 35/25 involvement [8] 6/20 16/25 17/7 17/9 17/9 17/12 22/3 23/19 irbesartan [2] 1/4 29/20 irrelevant [2] 13/1 13/2 isn't [1] 39/16 issue [4] 23/11 23/22 39/19 40/20 issues [3] 4/16 8/11 34/10 its [2] 29/14 37/4 IVES [2] 3/5 3/5</p> <hr/> <p>J Jane [1] 16/22 JASON [1] 2/15 JEFFREY [1] 3/2 JERSEY [4] 1/1 1/9 1/19 26/9 JESSICA [7] 2/3 4/6 9/21 12/7 14/15 19/8 31/20 Jinsheng [16] 4/15 4/22 5/19 25/15 27/6 27/7 27/25 28/3 29/16 34/6 34/17 37/18 39/5 39/23 41/4 41/6 job [1] 36/14 Joe [1] 16/22 John [4] 1/21 1/22 41/20 42/14 Jucaí [1] 9/11 judge [17] 4/11 5/7 5/18 7/5 9/10 17/2 17/24 20/14 20/15 24/24 26/17 29/7 32/21 33/25 38/4 38/12 41/25 judgment [1] 14/17 judicial [2] 3/14 23/22 July [3] 29/10 29/14 30/7 July 13 [2] 29/10 29/14 jump [1] 30/12 June [4] 9/6 15/19 21/24 25/3 June 15 [4] 9/6 15/19 21/24 25/3 jury [3] 11/18 28/20 32/5 just [32] 4/19 6/9 8/14 8/15 10/13 11/6 12/6 12/23 13/8 15/23 16/9 16/13 17/5 19/12 19/20 20/3 20/8 23/6 23/22 24/7 25/13 25/13 26/7 29/20 32/2 34/22 37/11 38/13 38/15 39/19 39/21 41/10 justified [2] 4/24 38/19</p> <hr/> <p>K KAPKE [1] 2/22 KARA [1] 2/22</p>	<p>KATZ [1] 1/17 keep [3] 6/22 18/17 26/25 kept [1] 39/25 key [2] 25/10 35/13 kind [1] 30/6 KIRKLAND [1] 2/10 KIRSTIN [1] 3/5 knew [6] 7/20 16/23 27/14 27/14 27/16 36/7 know [58] Knowing [1] 22/20 knowledge [16] 6/20 7/21 8/10 9/4 16/18 16/21 18/12 20/11 20/19 22/3 22/13 22/13 23/19 27/10 28/14 34/2 knowledgeable [1] 7/6 known [1] 7/2 knows [6] 11/23 18/6 22/7 23/25 25/20 37/2 Kong [28] 4/15 4/22 5/12 5/19 6/15 9/20 9/21 10/3 10/4 10/10 10/19 12/1 12/9 12/11 13/22 17/23 19/6 19/15 20/10 20/18 22/12 24/17 25/15 25/19 26/9 26/15 26/17 41/4 Kong's [1] 14/16 Kugler [1] 3/14 Kurz [3] 1/21 1/22 42/14</p> <hr/> <p>L lab [2] 29/17 30/5 lack [2] 9/3 39/14 laptop [1] 35/22 large [3] 15/9 15/13 41/10 Larry [1] 3/13 late [1] 6/8 later [2] 18/4 18/7 latest [1] 29/1 laughed [2] 17/25 18/1 laughing [1] 22/6 law [2] 3/14 4/23 lawyers [3] 15/1 15/25 16/4 lawyers' [1] 15/4 lays [1] 9/20 lead [3] 1/16 1/19 24/22 learn [1] 30/1 learned [6] 25/24 31/14 31/21 34/7 34/8 35/6 least [1] 27/15 leave [2] 7/8 33/22 left [1] 17/5 legal [1] 12/4 legitimate [1] 12/4 less [3] 6/1 39/6 39/7 let [10] 5/13 12/6 15/15 19/18 21/7 23/15 23/17 23/20 34/17 41/18 let's [5] 8/14 9/21 19/7 27/6 28/22 letter [1] 36/10 letters [1] 24/21 letting [1] 9/19 Lexington [1] 2/12</p>	<p>Li [10] 16/22 27/25 28/16 29/11 34/9 35/24 37/16 37/17 37/19 37/24 LIABILITY [1] 1/5 light [1] 9/19 like [14] 8/17 10/13 10/15 12/20 20/8 21/19 21/20 23/4 26/13 28/2 29/20 36/5 37/9 39/1 liked [1] 5/22 likely [1] 31/1 limit [1] 23/10 limited [1] 23/13 Lin [16] 4/15 4/22 5/19 17/17 25/15 27/6 27/7 28/3 29/16 34/7 34/17 37/18 39/5 39/23 41/4 41/6 Lin's [1] 27/25 linchpin [1] 21/21 Linda [1] 17/17 list [5] 6/19 7/7 8/3 17/5 17/6 listed [3] 7/5 28/3 39/17 literally [6] 9/18 10/16 18/1 18/15 29/24 29/25 litigants [1] 10/16 litigation [7] 1/5 13/5 15/12 16/3 32/17 39/9 40/1 little [4] 15/15 18/12 22/21 41/12 live [1] 24/14 LLC [5] 1/14 1/17 2/5 2/9 2/20 LLP [9] 2/2 2/6 2/10 2/14 2/17 2/21 3/2 3/5 3/8 locked [4] 34/19 37/16 37/16 37/24 long [1] 38/24 longer [1] 20/3 look [9] 6/16 7/5 9/3 9/4 11/10 13/11 35/13 41/11 41/20 looked [3] 8/24 29/17 39/4 looks [1] 29/20 Loretta [1] 3/14 LOSARTAN [1] 1/3 lose [2] 30/15 35/5 lost [1] 10/7 lot [8] 5/3 14/24 20/23 26/21 27/2 37/1 37/10 41/11 Loud [1] 4/9 Ltd [4] 2/5 2/9 2/13 2/19 lulled [2] 5/8 18/23</p> <hr/> <p>M MacStravic [1] 3/13 made [13] 6/12 17/10 17/24 19/19 19/23 19/24 20/5 20/14 20/17 22/11 31/24 32/20 41/2 Maggie [24] 4/15 4/22 5/11 5/19 6/15 9/20 9/21 10/3 10/4 10/10 10/19</p>	<p>12/1 12/9 12/11 14/16 17/23 19/5 19/15 22/12 24/17 25/15 25/18 26/8 41/4 main [1] 19/5 major [1] 13/25 make [12] 11/5 19/2 20/5 23/23 24/24 32/4 32/17 33/5 35/8 36/15 37/2 38/7 makes [2] 21/17 24/4 making [2] 17/15 32/15 Manhattan [1] 2/3 manner [2] 31/3 41/2 manpower [2] 7/25 17/8 manufacturing [3] 6/24 7/7 8/10 many [4] 26/13 28/24 38/23 38/23 March [2] 5/15 5/16 Market [1] 1/15 massive [1] 15/6 MASTER [2] 1/11 4/2 materially [1] 28/23 materials [2] 8/1 17/8 matter [4] 22/22 23/8 35/2 42/11 matters [1] 12/11 may [9] 9/6 15/19 18/19 21/24 25/2 36/2 36/23 36/24 38/16 May 24 [4] 9/6 15/19 21/24 25/2 maybe [3] 22/7 22/14 31/11 MAZIE [1] 1/17 Mckesson [1] 3/10 md [1] 1/4 MDL [3] 1/16 1/19 30/22 me [15] 4/8 5/13 12/6 12/13 15/15 16/8 18/1 23/15 30/20 32/4 37/6 37/12 40/18 41/18 41/21 MEAGHER [2] 2/2 2/6 mean [8] 22/3 23/7 31/14 32/10 35/15 37/9 38/1 40/1 meaning [1] 28/13 means [2] 8/23 35/16 mechanical [1] 1/23 meet [4] 4/25 39/2 39/11 39/13 mention [3] 38/12 38/13 38/15 Merck [1] 26/9 merely [1] 6/21 Meridian [1] 2/22 met [1] 39/3 might [1] 28/25 Min [9] 16/21 27/25 28/16 34/9 35/24 37/16 37/17 37/19 37/24 mind [3] 5/11 13/20 14/17 minute [1] 5/13 minutes [3] 26/5 26/6 36/23 misled [1] 5/9</p>
--	--	---	--	---

M missed [2] 35/12 35/20 missing [4] 8/25 20/21 20/21 20/22 misspoke [1] 21/7 Mitchell [1] 1/8 mixing [1] 14/25 moment [1] 38/15 Monday [1] 1/9 Monroe [1] 3/6 month [3] 6/1 12/23 13/3 months [2] 19/16 22/21 more [8] 6/12 12/13 16/11 22/16 30/11 33/1 33/5 41/12 morning [7] 4/4 4/5 4/6 4/7 4/9 4/12 21/6 Morris [5] 13/17 16/1 16/3 20/2 33/9 most [1] 9/9 motion [2] 22/25 25/16 mouthpiece [1] 7/23 move [3] 6/10 25/14 27/6 moved [3] 22/24 30/14 33/14 movies [1] 26/13 Mr. [29] 4/17 9/23 10/2 10/8 10/10 10/19 10/23 11/7 11/20 12/1 12/4 19/12 19/22 20/9 20/18 20/23 20/25 26/8 32/2 32/25 33/5 33/12 33/13 33/19 37/2 37/9 37/15 39/23 40/9 Mr. Bernardo [1] 20/23 Mr. Chen [2] 33/12 33/13 Mr. Slater [24] 4/17 9/23 10/2 10/8 10/10 10/19 10/23 11/7 11/20 12/1 12/4 19/12 19/22 20/9 20/25 26/8 32/2 33/5 33/19 37/2 37/9 37/15 39/23 40/9 Mr. Slater's [2] 20/18 32/25 Ms [1] 26/17 Ms. [5] 13/22 20/10 20/18 26/9 26/15 Ms. Kong [5] 13/22 20/10 20/18 26/9 26/15 much [6] 4/18 6/12 13/12 41/5 42/1 42/2 multiple [2] 32/21 33/19 my [9] 12/9 13/19 19/16 20/23 22/10 25/25 39/22 40/13 41/18 Mylan [1] 2/16 N N.W [1] 2/7 named [5] 6/7 27/8 27/11 27/22 27/22 narrow [2] 14/11 16/13 narrowed [1] 24/4 nature [1] 12/13 NDMA [2] 29/20 35/13	NE [1] 2/18 necessary [3] 17/21 17/21 28/6 need [6] 13/9 18/2 26/6 31/6 34/18 40/18 needed [2] 17/22 36/19 needs [1] 15/17 nefarious [1] 41/10 never [27] 8/19 14/23 16/17 18/24 24/22 25/5 25/5 25/18 25/18 25/19 27/22 27/22 27/23 28/3 28/4 29/22 31/6 34/13 34/13 35/19 36/7 36/7 37/20 38/24 39/3 39/11 39/19 new [11] 1/1 1/9 1/19 2/4 2/4 2/7 2/12 2/12 5/18 13/9 26/9 Next [1] 20/7 nice [1] 42/4 NINA [1] 2/7 nitrite [1] 29/21 nitrosamines [1] 29/13 njd.uscourts.gov [1] 1/22 no [50] nondisclosure [2] 4/24 38/19 none [2] 5/3 14/8 NORTON [1] 3/8 not [81] note [1] 8/17 noted [1] 26/17 nothing [10] 7/20 10/19 14/17 15/9 20/22 22/7 25/20 26/12 34/22 40/8 notice [2] 27/19 39/8 Novartis [1] 9/9 now [32] 4/8 4/13 6/5 7/5 7/7 7/23 7/24 8/11 8/21 11/21 12/25 14/15 18/6 21/7 22/20 23/20 24/7 24/22 25/9 28/12 28/15 28/17 28/22 30/12 33/19 34/10 34/11 34/16 34/23 37/15 41/9 41/15 nowhere [2] 11/16 15/18 number [15] 1/3 12/10 14/19 14/21 14/22 14/22 14/23 15/6 15/9 15/13 15/24 21/5 22/21 38/5 38/5 numbers [3] 14/25 15/16 15/17 O objected [1] 6/4 objections [1] 20/13 obligated [1] 36/18 obligations [3] 40/22 40/24 41/17 obvious [1] 36/3 obviously [17] 7/2 9/6 13/11 13/13 13/24 17/25 18/18 20/8 20/22 21/12 23/11 32/23 33/7 33/11 34/4 37/3 38/13	occurred [6] 13/13 14/13 17/11 25/18 25/19 39/7 October [2] 1/9 42/14 off [3] 4/19 17/5 35/22 offer [1] 28/5 offered [3] 27/10 27/23 28/4 officer [1] 25/6 Official [2] 1/21 42/8 often [1] 10/16 Oh [1] 27/16 Ohio [1] 3/3 okay [9] 8/20 12/8 12/24 16/9 19/7 23/2 26/1 31/8 34/23 once [2] 27/24 34/8 one [14] 2/3 2/15 4/20 10/12 15/24 21/4 28/11 32/17 33/5 38/5 38/12 38/15 38/20 39/21 one-sided [1] 32/17 ones [1] 16/4 ongoing [1] 32/16 only [6] 7/7 9/5 13/12 24/4 32/23 36/6 opportunity [2] 22/23 26/18 oppose [2] 22/8 25/22 opposing [1] 9/25 oral [2] 1/5 4/14 order [1] 11/7 ordinary [1] 38/22 organizational [2] 8/19 8/24 organize [1] 17/8 organizing [1] 7/25 other [9] 9/17 12/4 15/24 17/6 17/18 29/23 30/18 34/12 34/24 our [15] 4/21 5/4 9/20 18/9 25/1 25/22 25/24 29/3 31/14 34/1 35/15 35/18 35/19 36/11 36/14 ours [2] 7/3 11/4 out [19] 5/25 7/8 8/14 9/20 9/22 10/23 17/2 17/25 18/24 19/3 21/10 24/21 33/8 35/16 38/18 39/19 39/24 41/9 41/18 outside [2] 20/11 20/18 over [2] 6/18 23/16 overall [2] 6/25 9/5 overseen [1] 17/16 oversight [1] 17/15 overstate [1] 37/25 own [2] 28/19 28/19 Oxford [1] 2/15 P P.C [1] 2/11 papers [1] 12/15 paralegal [1] 21/6 Parkway [1] 1/18 part [1] 14/4 parties [1] 4/16 party [1] 16/6 pass [1] 24/24	passed [2] 22/14 22/15 past [1] 13/12 pathway [1] 6/6 PDF [1] 35/22 penalty [2] 41/1 41/3 pending [1] 22/25 Pennsylvania [2] 1/15 2/16 people [7] 17/19 27/9 31/5 33/20 34/24 35/3 35/15 period [11] 5/17 5/17 9/7 9/9 10/4 14/3 15/21 15/22 25/11 30/4 30/8 permissive [1] 11/11 permitted [1] 11/12 person [15] 13/21 18/11 22/7 22/12 23/25 23/25 31/1 31/25 32/9 32/24 33/3 33/18 33/20 34/25 37/23 personal [5] 6/20 7/21 16/20 18/12 23/18 perspective [4] 4/21 12/10 32/8 35/18 Pharma [2] 2/13 2/20 pharmaceutical [6] 2/4 2/5 2/8 2/9 2/19 9/8 Pharmaceuticals [3] 2/13 2/16 2/20 Pharmacy [1] 2/23 Philadelphia [1] 1/15 piece [2] 36/12 41/8 Piedmont [1] 2/18 PIETRAGALLO [1] 2/14 Pittsburgh [1] 2/16 plaintiffs [17] 1/16 1/19 4/10 5/9 5/9 6/10 26/23 31/11 31/23 32/4 32/7 32/12 33/4 33/7 33/12 33/15 37/12 plaintiffs' [4] 4/14 20/9 31/23 40/10 plan [2] 26/12 26/14 platform [1] 7/22 played [1] 12/16 point [11] 9/22 10/23 11/6 19/18 28/9 31/23 33/5 34/18 37/7 39/9 40/6 pointing [1] 17/2 points [1] 19/5 policies [1] 39/25 policy [6] 38/21 39/4 39/19 39/20 40/6 40/7 politics [1] 13/20 position [3] 13/19 25/24 25/25 possess [1] 12/11 possibly [1] 11/1 post [1] 10/4 potential [2] 33/10 39/9 preclude [4] 4/15 23/10 30/14 32/18 precluded [2] 23/12 40/25 preclusion [1] 40/24	prejudice [4] 6/6 9/18 21/21 24/16 prejudiced [2] 28/22 39/14 prejudicial [2] 30/9 38/2 present [3] 3/12 8/14 33/17 presented [1] 41/13 president [2] 8/22 12/19 presume [1] 28/15 pretty [1] 36/3 principles [2] 4/20 5/11 Princeton [2] 2/5 2/9 prior [1] 20/4 privilege [2] 14/25 15/7 probably [1] 26/8 problem [3] 8/2 26/10 39/2 problematic [1] 30/9 problems [1] 28/11 Procedure [1] 30/25 proceed [2] 4/17 40/15 proceedings [4] 1/23 4/1 42/7 42/11 process [10] 6/8 10/15 10/15 10/17 10/21 10/21 10/22 23/11 38/1 40/25 procurement [2] 7/25 17/8 procuring [1] 24/20 produce [1] 39/1 produced [8] 1/24 10/3 14/16 15/8 17/4 35/9 35/11 35/20 product [3] 6/24 14/6 29/23 production [1] 6/19 productions [1] 5/6 PRODUCTS [1] 1/4 proffer [2] 7/10 28/12 proffered [3] 8/4 9/14 18/18 proffering [1] 17/1 profit [1] 5/9 projects [1] 13/4 promise [1] 41/18 promotion [2] 12/23 13/3 prompt [3] 40/18 41/14 41/18 proof [2] 38/18 39/13 provided [1] 20/24 proxy [1] 7/4 purpose [1] 19/14 pursued [1] 18/24 put [5] 9/13 23/5 25/3 25/9 33/13 Q Qiangming [1] 29/11 quenching [2] 29/21 35/13 question [8] 7/19 12/3 23/22 24/8 30/11 30/19 30/23 40/4 questioned [1] 33/19 questioner [1] 12/3 questioning [1] 22/18
--	---	--	--	--

<p>Q</p> <p>questions [4] 12/6 29/6 30/11 32/11</p> <p>quickly [3] 40/8 41/19 41/20</p> <p>quote [1] 37/16</p> <p>R</p> <p>raised [1] 40/22</p> <p>ran [2] 29/17 30/5</p> <p>RASPANTI [1] 2/14</p> <p>rather [2] 37/14 40/12</p> <p>raw [1] 15/16</p> <p>RDR [1] 42/14</p> <p>RDR-RMR-CRR-CRC [1] 42/14</p> <p>RE [1] 1/3</p> <p>reach [1] 33/8</p> <p>reaction [1] 8/5</p> <p>reading [1] 8/3</p> <p>ready [1] 4/17</p> <p>real [1] 39/2</p> <p>really [11] 5/3 5/10 6/13 7/15 7/17 11/5 11/10 12/22 15/11 15/16 26/22</p> <p>reason [10] 9/14 10/11 11/24 25/16 25/20 26/15 27/21 28/2 28/21 34/11</p> <p>reasons [1] 23/5</p> <p>reassure [1] 26/7</p> <p>recall [17] 7/12 8/5 8/6 9/11 10/5 10/5 14/2 14/2 16/14 17/14 17/19 24/20 36/8 36/9 37/19 38/24 39/7</p> <p>received [2] 13/3 27/25</p> <p>recollection [1] 22/11</p> <p>reconsider [1] 11/21</p> <p>record [4] 4/13 5/1 25/6 42/11</p> <p>recorded [1] 1/23</p> <p>records [3] 38/21 39/18 40/5</p> <p>REEFER [1] 2/15</p> <p>regarding [1] 4/21</p> <p>regulators [1] 8/3</p> <p>regulatory [16] 6/25 7/9 7/11 7/12 7/24 8/2 8/5 8/8 8/11 10/25 10/25 11/2 17/4 17/14 17/14 17/17</p> <p>relate [1] 13/5</p> <p>related [4] 7/11 11/2 12/11 17/13</p> <p>relevance [3] 7/16 14/17 15/10</p> <p>relevant [13] 6/21 7/21 12/12 16/19 20/3 22/13 24/18 27/10 27/22 27/23 30/4 35/9 35/14</p> <p>remember [2] 15/1 27/8</p> <p>remembered [1] 25/13</p> <p>remote [1] 4/1</p> <p>Reporter [2] 1/21 42/15</p> <p>REPORTER'S [1] 42/8</p> <p>Reporter/Transcriber [1] 42/15</p> <p>reports [1] 17/16</p>	<p>represent [1] 35/11</p> <p>representation [1] 13/14</p> <p>representations [5] 17/10 17/24 20/4 22/11 23/24</p> <p>represented [5] 18/16 18/17 22/2 22/12 23/18</p> <p>request [1] 4/14</p> <p>require [1] 41/1</p> <p>required [6] 11/12 27/9 31/17 35/2 35/8 39/5</p> <p>reset [1] 16/2</p> <p>resonate [1] 16/8</p> <p>respectfully [1] 38/9</p> <p>respond [1] 38/14</p> <p>response [3] 34/25 38/14 39/22</p> <p>responsibilities [4] 7/1 7/9 7/24 17/4</p> <p>resume [1] 26/8</p> <p>RET [3] 1/11 3/14 4/2</p> <p>Retailer [1] 2/23</p> <p>retention [4] 38/21 39/4 39/18 40/6</p> <p>reversed [1] 38/8</p> <p>right [28] 4/13 10/9 10/20 10/21 10/22 11/9 17/7 18/25 19/7 20/6 21/8 21/9 23/9 25/11 27/5 27/6 27/11 30/6 30/13 30/19 31/20 33/16 33/17 33/21 36/22 40/16 41/15 41/24</p> <p>RMB [1] 1/4</p> <p>RMR [1] 42/14</p> <p>Road [1] 2/18</p> <p>Robert [1] 3/14</p> <p>role [6] 12/14 12/16 12/19 13/9 18/13 24/22</p> <p>roles [2] 13/21 35/3</p> <p>ROSE [2] 2/7 3/8</p> <p>Roseland [1] 1/19</p> <p>Ross [1] 3/9</p> <p>rotten [1] 15/20</p> <p>RUBEN [1] 1/14</p> <p>Rule [5] 25/15 30/24 31/16 40/22 40/23</p> <p>rules [8] 20/7 20/12 20/19 20/25 21/16 30/24 41/1 41/1</p> <p>ruling [7] 9/16 11/21 40/18 40/19 41/14 41/14 41/18</p> <p>running [1] 24/21</p> <p>runs [1] 20/14</p> <p>S</p> <p>safety [1] 8/9</p> <p>said [41] 6/19 6/23 6/25 8/16 9/2 10/24 15/1 15/5 15/24 16/13 16/24 17/4 17/6 17/11 18/1 18/22 19/1 19/12 19/16 21/25 24/17 24/22 25/14 25/20 25/22 28/2 29/19 31/11 33/5 34/5 34/8 34/16 34/19 34/22 35/6 36/16 37/9 37/16 37/20 38/4 40/5</p>	<p>SAK [1] 1/4</p> <p>sale [3] 6/24 7/8 8/10</p> <p>sales [2] 7/14 14/8</p> <p>sanction [3] 11/20 11/22 40/24</p> <p>sanctions [6] 11/7 11/7 11/21 25/14 26/23 26/23</p> <p>sat [2] 12/10 32/22</p> <p>saw [4] 8/19 12/15 34/2 38/20</p> <p>say [40] 5/2 6/17 7/11 7/16 10/17 10/20 11/1 11/16 15/25 16/9 16/20 16/24 18/6 18/15 18/16 18/18 18/19 18/21 21/5 21/21 21/25 22/1 22/4 23/24 24/6 25/6 26/23 27/18 28/18 30/12 30/18 32/16 33/1 33/9 34/17 34/18 36/5 39/18 40/4 41/15</p> <p>saying [10] 10/2 17/25 18/3 20/2 20/3 22/1 22/4 22/6 24/23 41/3</p> <p>says [8] 11/11 11/13 11/17 14/15 19/22 28/17 34/22 36/16</p> <p>scarce [1] 9/5</p> <p>scheduled [1] 5/15</p> <p>scheduling [1] 5/18</p> <p>scope [4] 16/25 18/21 20/11 20/19</p> <p>scrubbed [2] 38/22 39/1</p> <p>search [2] 35/12 35/13</p> <p>secondly [1] 26/11</p> <p>seconds [1] 26/4</p> <p>secret [1] 26/14</p> <p>secretarial [1] 13/23</p> <p>see [1] 39/20</p> <p>seeing [1] 29/20</p> <p>seem [2] 28/2 28/5</p> <p>seemed [1] 36/3</p> <p>seems [1] 37/12</p> <p>seen [6] 9/1 12/2 26/13 29/22 37/20 39/4</p> <p>semantics [1] 23/6</p> <p>sending [1] 24/21</p> <p>sense [2] 5/2 24/24</p> <p>sent [1] 28/14</p> <p>series [1] 14/12</p> <p>set [1] 4/14</p> <p>she [87]</p> <p>she's [25] 6/21 7/16 7/18 8/4 8/22 13/3 14/6 14/25 16/15 16/18 18/4 18/8 18/15 18/18 19/13 19/16 19/17 19/17 19/23 19/24 21/17 21/25 22/4 24/23 26/21</p> <p>ship [1] 20/15</p> <p>should [8] 9/14 11/14 11/16 22/7 24/3 24/4 36/17 40/15</p> <p>shouldn't [6] 6/5 11/2 19/1 19/2 23/25 35/5</p> <p>show [3] 4/24 29/22 38/19</p>	<p>showed [1] 34/13</p> <p>showing [1] 30/1</p> <p>shown [2] 35/12 37/19</p> <p>shows [1] 37/10</p> <p>sided [1] 32/17</p> <p>similar [1] 13/19</p> <p>simply [3] 22/13 22/16 41/8</p> <p>since [2] 13/5 33/12</p> <p>single [2] 21/3 31/24</p> <p>sit [1] 26/18</p> <p>sits [1] 19/22</p> <p>situation [4] 23/5 25/9 30/10 33/2</p> <p>size [1] 15/12</p> <p>SKADDEN [6] 2/2 2/6 13/13 15/25 20/2 20/23</p> <p>slate [3] 2/2 2/6 8/15</p> <p>SLATER [27] 1/17 1/17 4/11 4/17 9/23 10/2 10/8 10/10 10/19 10/23 11/7 11/20 12/1 12/4 19/12 19/22 20/9 20/25 26/8 32/2 33/5 33/19 37/2 37/9 37/15 39/23 40/9</p> <p>Slater's [2] 20/18 32/25</p> <p>sleep [1] 18/23</p> <p>slipped [1] 35/20</p> <p>smell [1] 24/24</p> <p>Smith [3] 3/14 16/22 16/22</p> <p>SMO [1] 11/9</p> <p>so [67]</p> <p>sodium [1] 29/21</p> <p>soften [1] 18/19</p> <p>Solco [2] 2/5 2/9</p> <p>some [6] 12/16 12/17 13/4 15/6 27/15 29/23</p> <p>somebody [3] 23/23 32/12 37/21</p> <p>somehow [5] 11/1 20/3 20/10 23/11 41/9</p> <p>someone [1] 32/11</p> <p>something [19] 9/15 10/15 13/9 15/2 15/5 15/19 15/23 18/4 18/7 19/4 20/16 21/20 24/25 26/14 33/6 34/5 38/3 38/21 39/20</p> <p>sometimes [1] 22/15</p> <p>sorry [1] 40/9</p> <p>sort [2] 32/18 32/19</p> <p>South [1] 2/22</p> <p>speaking [3] 7/13 28/1 28/8</p> <p>special [3] 1/11 4/2 38/25</p> <p>specific [2] 29/25 30/5</p> <p>specifically [1] 7/13</p> <p>speculation [5] 26/13 37/3 37/11 37/14 40/10</p> <p>spoke [2] 7/17 27/24</p> <p>staff [8] 6/21 8/21 9/2 12/13 12/17 13/19 13/20 18/14</p> <p>stand [1] 9/19</p> <p>standards [1] 11/23</p> <p>start [5] 4/19 5/11 6/15</p>	<p>21/11 23/15</p> <p>started [2] 28/25 38/18</p> <p>starting [1] 27/7</p> <p>statement [1] 31/9</p> <p>STATES [3] 1/1 21/17 24/13</p> <p>stayed [1] 11/23</p> <p>stenography [1] 1/23</p> <p>Steps [1] 8/9</p> <p>STEVEN [1] 2/18</p> <p>still [5] 15/9 18/7 21/2 24/16 36/9</p> <p>story [1] 15/17</p> <p>strategic [2] 19/19 32/7</p> <p>strategically [1] 33/16</p> <p>strategy [3] 27/19 27/20 33/4</p> <p>Street [4] 1/15 2/22 3/3 3/6</p> <p>Streets [1] 1/8</p> <p>stronger [1] 32/8</p> <p>subject [2] 28/8 35/2</p> <p>subjects [1] 31/2</p> <p>submit [1] 38/9</p> <p>substantially [2] 4/24 38/19</p> <p>substantive [3] 12/14 12/17 13/21</p> <p>substitute [1] 24/14</p> <p>succinct [1] 39/23</p> <p>such [2] 39/20 40/7</p> <p>sudden [4] 7/23 8/12 8/18 18/6</p> <p>suddenly [2] 18/4 23/20</p> <p>sufficient [1] 6/14</p> <p>suggest [1] 39/23</p> <p>suggested [1] 33/6</p> <p>suggestion [1] 41/10</p> <p>Suite [6] 1/15 1/18 2/18 3/3 3/6 3/9</p> <p>Suites [1] 2/3</p> <p>support [1] 11/25</p> <p>suppose [1] 28/21</p> <p>supposed [2] 35/9 35/19</p> <p>sure [9] 7/15 9/1 13/7 13/15 16/10 27/16 31/10 35/9 38/7</p> <p>surprise [1] 37/21</p> <p>surprised [3] 12/15 35/23 35/24</p> <p>surrounding [1] 41/6</p> <p>suspect [1] 41/7</p> <p>suspense [1] 5/17</p> <p>T</p> <p>take [24] 5/16 5/18 5/20 5/24 6/5 6/10 7/20 8/17 18/2 18/5 19/2 21/2 21/9 21/11 21/13 21/18 22/19 23/3 29/3 34/12 34/16 36/14 36/19 42/5</p> <p>taken [1] 8/9</p> <p>taking [6] 5/21 18/2 19/21 22/9 22/17 24/6</p> <p>talk [16] 7/24 8/4 8/12 8/15 9/7 13/9 15/23 16/4 18/8 18/9 19/14 19/23</p>
---	---	--	--	--

<p>T talk... [4] 19/24 25/4 28/12 28/22 talked [2] 14/8 36/21 talking [1] 14/14 talks [1] 19/13 tangentially [1] 11/2 team [1] 9/11 TEAMS [2] 1/5 4/1 tell [7] 9/1 13/12 13/17 13/18 15/16 29/7 37/22 telling [2] 19/11 37/4 term [1] 41/7 terms [4] 5/5 23/23 35/13 41/17 test [3] 7/25 17/8 24/24 testified [1] 34/25 testifies [2] 10/12 12/5 testify [24] 9/12 9/15 9/19 10/3 14/5 14/7 16/15 16/16 19/1 20/10 20/16 21/16 23/8 23/15 23/17 24/11 24/13 24/23 25/19 25/23 28/4 37/24 38/11 40/14 testifying [5] 4/15 6/4 18/20 20/18 34/11 testimony [16] 9/17 19/3 21/19 22/25 23/10 24/14 28/6 28/7 28/10 28/19 29/8 29/11 30/14 34/15 34/21 37/17 testing [13] 6/24 7/7 7/13 8/1 8/10 14/8 17/7 17/8 17/9 17/10 24/22 24/23 30/6 Teva [4] 2/19 2/20 2/20 7/17 Texas [1] 3/10 Thank [12] 4/18 19/9 19/9 21/8 27/5 33/23 36/22 36/25 38/17 41/25 42/2 42/3 Thanks [2] 4/9 41/23 them [9] 5/3 6/4 15/18 20/5 21/10 24/10 24/16 28/9 40/7 theories [2] 37/1 37/3 therefore [1] 37/17 these [13] 6/2 6/6 6/17 8/2 13/25 17/6 17/11 17/20 17/21 17/21 18/3 29/6 34/10 they'll [1] 20/9 they're [9] 16/7 17/1 24/23 25/3 28/17 29/20 32/14 35/9 40/14 they've [5] 14/15 25/5 25/5 38/24 39/3 thing [4] 19/1 36/6 38/12 38/15 things [15] 6/19 8/12 8/16 12/2 14/7 15/4 17/6 17/20 18/16 18/18 24/20 25/23 34/2 38/4 38/20 think [53] thinks [3] 10/11 10/19</p>	<p>12/1 this [82] THOMAS [2] 1/11 4/2 THORNBURG [1] 2/21 thoroughly [1] 28/20 though [1] 19/13 thought [4] 16/10 30/13 37/15 38/4 three [2] 7/8 8/16 through [7] 6/11 7/10 12/10 15/4 17/13 35/8 35/20 throughout [1] 16/3 thrown [1] 39/20 tied [2] 25/1 29/5 tight [1] 20/15 time [16] 4/14 6/3 9/9 13/8 14/3 15/21 15/22 22/8 23/12 23/13 25/10 27/15 28/14 30/4 30/8 40/25 timely [3] 4/22 31/3 41/2 times [2] 15/24 32/21 title [3] 8/18 8/25 12/16 today [3] 11/20 23/1 41/24 together [1] 9/13 told [12] 7/8 7/20 11/18 13/17 14/19 15/17 17/20 20/2 28/12 31/5 33/10 34/1 tomorrow [1] 21/3 too [5] 10/16 10/21 18/17 26/13 33/17 took [4] 13/13 25/24 34/9 35/1 Torrent [4] 2/13 2/13 2/13 7/17 Transcriber [1] 42/15 transcript [4] 1/23 41/12 41/20 42/10 transcription [1] 1/24 translation [1] 28/20 TRAURIG [1] 2/17 trial [48] trials [1] 40/13 tried [2] 17/3 19/12 troubling [1] 37/6 try [9] 5/23 9/15 9/16 9/24 18/19 20/10 28/17 37/13 40/11 trying [1] 16/24 tumbled [1] 41/9 turn [1] 6/18 turns [1] 29/24 TV [1] 37/10 two [12] 6/11 12/23 13/3 26/5 26/6 36/23 38/4 38/5 38/24 39/6 39/6 39/7 type [1] 29/13</p> <p>U U.S [9] 1/8 2/5 2/5 2/9 2/9 24/5 26/10 30/15 36/2 ULMER [1] 3/2 ultimate [3] 8/13 8/13 9/25</p>	<p>ultimately [2] 5/7 6/9 unavailability [1] 5/23 unbelievable [1] 25/9 under [3] 7/10 8/1 39/9 understand [12] 7/18 8/11 12/20 18/7 19/13 22/1 24/20 26/20 31/14 31/15 35/10 40/16 understanding [1] 35/19 understood [1] 20/1 unfair [5] 23/4 23/15 23/17 23/20 25/12 unfavorable [1] 11/13 unfortunate [1] 14/12 unique [2] 10/6 10/9 UNITED [3] 1/1 21/17 24/13 universe [1] 15/10 unknown [2] 29/14 30/6 unless [1] 9/15 unpack [1] 15/15 unprecedented [1] 32/4 unreasonable [1] 24/15 unrelated [1] 13/10 until [2] 23/1 27/11 up [4] 5/7 14/25 30/12 35/14 upheaval [1] 13/25 upon [1] 22/10 us [21] 3/8 5/22 6/5 7/20 9/1 15/25 19/18 22/6 23/4 25/12 25/18 25/19 28/6 30/3 34/1 34/2 34/11 34/13 35/10 35/11 36/17 USA [1] 2/20 use [6] 5/23 9/24 10/14 10/14 24/7 41/7 used [7] 9/23 13/20 29/13 31/23 35/7 35/23 36/17 using [2] 29/12 30/5</p> <p>V valsartan [8] 1/3 8/9 10/6 13/24 29/14 29/21 30/7 35/13 VANASKIE [3] 1/11 4/2 26/17 very [31] 4/18 11/19 11/22 11/24 12/2 13/19 14/1 14/3 14/11 15/21 15/21 16/13 18/12 19/11 20/14 20/14 20/17 20/17 25/12 25/12 27/13 30/9 30/9 32/20 33/14 34/21 38/4 39/22 41/5 41/25 42/2 via [2] 1/5 4/1 vice [2] 8/22 12/19 videoconferencing [2] 1/6 4/1 view [1] 31/14 Vine [1] 3/3 violation [3] 10/16 38/1 40/23 violations [1] 36/10</p>	<p>W Walgreens [1] 2/24 walk [1] 6/11 Walmart [1] 2/24 want [47] wanted [3] 16/9 18/19 33/12 wanting [2] 12/5 37/25 wants [4] 7/24 9/7 10/8 18/21 warning [1] 36/10 Washington [1] 2/8 wasn't [10] 9/10 9/10 9/23 12/16 15/25 16/10 20/5 23/3 27/10 27/11 watched [1] 37/10 way [2] 13/22 35/22 ways [1] 10/8 we'll [4] 4/13 4/17 24/7 30/12 we've [4] 23/5 25/23 29/22 39/4 week [1] 21/19 weeks [1] 18/24 weird [1] 31/9 weren't [3] 32/13 34/16 35/2 West [1] 2/3 whatever [8] 8/23 10/11 14/20 16/3 18/13 18/20 32/11 34/17 while [1] 22/11 who's [2] 9/12 20/23 whole [1] 36/13 Wholesaler [1] 3/4 whom [2] 29/3 33/15 why [25] 5/16 6/12 7/14 7/19 9/14 18/1 18/5 21/9 22/6 22/19 25/14 26/15 27/19 29/19 29/22 30/11 31/5 32/9 34/6 35/1 35/20 35/21 35/22 38/25 40/22 will [12] 7/1 9/1 11/18 20/8 21/6 21/7 26/16 37/19 38/9 41/3 41/14 41/16 within [8] 7/14 16/25 18/21 21/19 35/4 36/12 36/20 39/5 without [1] 36/11 witness [39] 6/15 6/17 8/14 16/12 16/15 16/16 16/18 17/17 18/11 19/15 20/16 22/19 23/10 24/6 24/7 24/8 24/11 24/12 25/2 25/10 25/17 25/21 25/23 27/11 27/23 27/24 28/3 28/8 28/17 28/18 29/3 29/9 30/13 34/10 34/12 34/14 34/20 34/23 36/16 witnesses [21] 6/2 6/6 6/7 6/12 9/17 10/18 11/17 17/18 17/22 20/8 20/9 23/12 25/17 26/24 33/10 34/1 34/23 36/21 38/23 40/13 40/24</p>	<p>won't [1] 10/11 word [5] 9/23 9/24 10/14 10/14 10/25 words [2] 10/5 11/10 work [2] 13/20 26/20 worked [2] 26/9 28/24 working [1] 13/4 works [1] 40/1 wouldn't [2] 17/25 28/16 write [2] 19/12 32/10 writing [3] 28/13 40/19 41/15 written [4] 29/5 29/10 39/7 39/8 wrong [1] 28/18 wrote [11] 32/9 32/12 32/24 33/3 33/19 34/24 35/3 36/9 37/23 39/2 39/16</p> <p>Y Yeah [4] 15/3 16/7 22/9 26/3 years [7] 7/8 8/16 28/24 38/24 39/6 39/6 39/7 Yes [6] 13/2 30/21 33/25 38/16 38/16 41/22 yet [2] 29/25 30/7 York [5] 2/4 2/4 2/7 2/12 2/12 you [89] you've [1] 26/13 yourself [1] 22/22</p> <p>Z Zhejiang [2] 2/4 2/8 ZHP [35] 2/5 2/9 4/21 4/23 5/2 5/21 6/16 10/7 10/9 11/13 11/16 13/14 16/3 16/4 20/8 26/24 27/9 27/22 28/7 31/21 32/14 32/18 32/19 32/23 33/6 33/9 33/13 35/6 35/7 35/11 35/16 35/23 36/15 37/6 38/18 ZHP's [1] 8/5 Zoom [1] 24/6</p>
--	--	---	---	---